

**Region 4
Asbestos/Vermiculite Investigation:**

**Asbestos Results from Vermiculite Processing Facilities in South Carolina
(June 2001)**



October 17, 2001

Science and Ecosystem Support Division
Environmental Investigations Branch
980 College Station Road, Athens, Georgia 30605



INTRODUCTION

On June 6, 2001 staff from the USEPA Region 4, Science and Ecosystem Support Division (SESD), Enforcement and Investigations Branch (EIB) collected vermiculite ore samples from processing facilities and mines in the Enoree and Woodruff, South Carolina areas. The facilities are primarily vermiculite expansion plants or mines. The focus of the sampling was to determine if current handling and processing activities have resulted in asbestos contamination that would be a threat to on-site or off-site human receptors. The results of these sampling investigations are included in this report.

BACKGROUND

The concern over asbestos contamination arose from the discovery of high concentrations of asbestos in the vermiculite deposits in Libby, Montana. The W.R. Grace Company closed the Libby Mine in 1990, but investigators wanted to determine if vermiculite ore from Libby had been shipped to other processing plants around the country. In May 2000 an evaluation of 22 past and present vermiculite operations in Region 4 was initiated by the Emergency Response and Removal Branch (ERRB) in Atlanta, GA. Site surveys were conducted by a Superfund Technical Assessment and Response Team (START) contractor to determine if sampling was necessary. Of the 22 facilities evaluated it was determined that only 8 would require sampling. This sampling occurred between October 2000 and March 2001. In May 2001, three more facilities were added to the sampling list. These were Carolina Vermiculite, Palmetto Vermiculite and WR Grace in South Carolina.

STUDY OBJECTIVES

The objective was to collect bulk material samples from each facility and analyze them for releasable asbestos using both Polarized Light Microscopy (PLM) and Transmission Electron Microscopy (TEM). The result would be used to determine if the material was "asbestos containing" according to the Toxic Substances Control Act (TSCA) definition of greater than 1% asbestos by weight (U S Code: Title 15, Section 2624).

STUDY AREA

The following facilities in South Carolina were sampled:

| | | |
|----------------------|---------------|--------------|
| Carolina Vermiculite | P O Box 98 | Woodruff, SC |
| Palmetto Vermiculite | P O Box 178 | Woodruff, SC |
| WR Grace | 26383 Hwy 221 | Enoree, SC |

STUDY METHODS

Surface soil samples were collected, when possible, close to where the exfoliation process was

conducted and in the area where the raw ore was stored. Additionally, a sample of the raw ore was collected when available. If the plant had more than one source of vermiculite, a sample was collected from each source. Approximately 1 kg of sample was collected for analysis. All samples were collected in accordance with the US EPA Region 4, Environmental Investigations Standard Operating Procedures and Quality Assurance Manual, May, 1996. Samples were analyzed in accordance with the **US EPA Superfund Method for the Determination of Releasable Asbestos in Soils and Bulk Materials, Interim Version (Revised MDL)**. Laboratory data sheets are Attachment 1.

STUDY RESULTS

Carolina Vermiculite, Woodruff, SC 06/06/01
Project #01-0811

| Sample ID | Sample Description | Results |
|-----------|-------------------------------------|---------------|
| CV-001-VO | Ore from Hanna Mine | None Detected |
| CV-002-VO | Blend pile | None Detected |
| CV-003-VO | "Slime" from ditch to settling pond | None Detected |
| CV-004-VO | Ore concentrate | None Detected |
| CV-005-VO | Ore from Fanny Young Mine | None Detected |

Palmetto Vermiculite, Woodruff, SC 06/06/01
Project #01-0812

| Sample ID | Sample Description | Results |
|-----------|--|---------------|
| PV-123-VO | Composite of African ore grades A2, A3, A4 | None Detected |
| PV-004-VO | Virginia ore | None Detected |
| PV-005-VO | Carolina ore | None Detected |
| PV-006-VO | Waste rock | None Detected |
| PV-007-VO | Finished product | None Detected |

WR Grace, Enoree, SC 06/06/01
Project #01-0809

| Sample ID | Sample Description | Results |
|-----------|---------------------------------|---------------------------|
| WR-001-VO | Davis Mine ore | <1% Tremolite /Actinolite |
| WR-002-VO | Ball Mine ore | <1% Tremolite |
| WR-003-VO | Rim Pile at plant | None Detected |
| WR-004-VO | #3 ore concentrate | None Detected |
| WR-005-VO | #4 expanded vermiculite | <1% Tremolite |
| WR-006-VO | Stoner rock from #4 vermiculite | None Detected |
| WR-007-VO | Tailings pond | <1% Tremolite /Actinolite |

The above results were submitted by EMSL Laboratory, Westmont, NJ and reviewed by Integrated Laboratory Systems, Athens, GA. No data qualifiers were applied to the results.

CONCLUSIONS

From the laboratory results, 13 of the 17 samples submitted for asbestos analysis were "None Detected" and the remaining 4 samples were "<1% Tremolite" or "<1% Tremolite/Actinolite". Therefore, according to the current TSCA definition of >1% being an asbestos containing material, no further action is needed.

LITERATURE CITED

US EPA Region 4 Environmental Investigations Standard Operating Procedures and Quality Assurance Manual. May 1996.

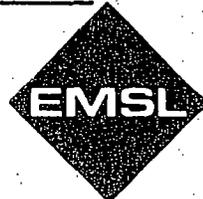
US EPA Superfund Method for the Determination of Releasable Asbestos in Soils and Bulk Materials, Interim Version, Revised MDL.

Toxic Substances Control Act, US Code: Title 15, Section 2642.

ATTACHMENT 1

ANALYTICAL DATA SHEETS

**Submitted by
EMSL Laboratory
Westmont, NJ
and reviewed by
Integrated Laboratory Systems,
Athens, GA**



August 8, 2001

Jim Gray
US EPA
College Station Rd
Athens, GA 30613-7799

RE: EMSL Order ID# 040109201

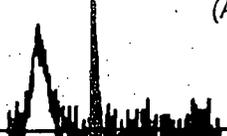
Dear Jim:

Attached please find the results of your soil samples from the above referenced order number. These samples were analyzed for asbestos content via PLM NIOSH 9002 (Issue 2) and for asbestos structure quantification via the Draft Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material Method (EPA-540-R97-028 EPA Superfund). This letter is meant to document all the structure quantities identified by the Elutriator method including those not counted/reported based on the method's requirements. A summary of the results are given in the table below, explanatory notes follow. All results are from the reading of 10 grid openings for each analyzed sample.

| <u>Customer Sample ID/ EMSL Sample ID</u> | <u>Total Asbestos Structures₂</u> | <u>Reported Asbestos Structures₃</u> | | <u>Excluded Asbestos Structures₆</u> | <u>Mineral Fibers of Concern₇</u> |
|---|--|---|-------------------------|---|--|
| | | <u>Protocol₄</u> | <u>Long₅</u> | | |
| PV-004-VO/040109201-0001 | NOT REPORTED ₁ | N/A | N/A | N/A | N/A |
| PV-005-VO/040109201-0002 | NOT REPORTED ₁ | N/A | N/A | N/A | N/A |
| PV-006-VO/040109201-0003 | 0 | 0 | 0 | 0 | 3 |
| PV-007-VO/040109201-0004 | NOT REPORTED ₁ | N/A | N/A | N/A | N/A |
| PV-123-VO/040109201-0005 | 0 | 0 | 0 | 0 | 1 |
| CV-001-VO/040109201-0006 | 0 | 0 | 0 | 0 | 3 |
| CV-002-VO/040109201-0007 | 0 | 0 | 0 | 0 | 0 |
| CV-003-VO/040109201-0008 | 0 | 0 | 0 | 0 | 0 |
| CV-004-VO/040109201-0009 | 0 | 0 | 0 | 0 | 0 |
| CV-005-VO/040109201-0010 | 0 | 0 | 0 | 0 | 5 |
| CV-003-VO (QC) / 040109201-0013 | 0 | 0 | 0 | 0 | 5 |

Notes:

1. These samples of soil/vermiculite did not generate any measurable (by weight) respirable dust for analysis when placed in the elutriator and such the subsequent analysis could not be performed. It is believed that these samples may have been subjected to a preparatory or processing procedure incorporating sieving. This may have resulted in size discrimination in these samples, leaving no particles <10µ.
2. Total asbestos structures represents all asbestos structures (fibers, bundles, cluster, and matrix) found during analysis. This includes six asbestos types-Chrysotile and Amphibole Asbestos (Amosite, Actinolite, Tremolite, Crocidolite, and Anthophyllite).

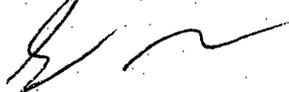


Notes(Continued)

3. Reported asbestos structures represent all asbestos structures that meet the reporting requirements based on size as stated in the EPA Superfund Method. These structures must be $\leq 0.5\mu$ in diameter and $\geq 5\mu$ in length.
4. Protocol asbestos structures represent all asbestos structures that meet the requirements of Notes 1 and 2 and are $5-10\mu$ in length.
5. Long asbestos structures represent all asbestos structures that meet the requirements of Notes 1 and 2 and are $>10\mu$ in length.
6. Excluded asbestos structures represent all asbestos structures that meet the requirements of Note 1 but do not meet the size requirements of Notes 2-4.
7. Mineral Fibers of Concern represent a newer class of amphibole categories that has been identified by the USEPA Region 8 in conjunction with the Libby, MT project. These include richterite and winchite. The "Libby Amphiboles" are not currently classified as asbestos but those performing the risk assessment and exposure modeling from the sample results may take this mineral fiber data into consideration.

If you need any calculations based on the Libby Amphiboles identified in these samples, please let me know and I can create additional reports showing this data. If you have any questions or need further information please do not hesitate to contact me at 800-220-3675X 1209.

Sincerely,



Stephen Siegel, CIH
Asbestos Lab Manager



EPA US EPA SESD Athens GA
Generic Chain of Custody

Copy

Reference Case: **R**
 Client No:

| Region: 4 Project Code: 01-0812 Account Code: 50102D04ZZQB00 CERCLIS ID: Spill ID: Site Name/State: Palmetto Vermiculite/SC Project Leader: Kevin Simmons Action: Sampling Co: US EPA SESD | Date Shipped: 6/14/2001 Carrier Name: FedEx Airbill: Shipped to: EMSL Analytical Inc 107 Haddon Ave Westmont NJ 08108 (856) 858-4800 | Chain of Custody Record Sampler Signature: <i>[Signature]</i> <table border="1"> <thead> <tr> <th>Relinquished By</th> <th>(Date / Time)</th> <th>Received By</th> <th>(Date / Time)</th> </tr> </thead> <tbody> <tr> <td>1 <i>[Signature]</i></td> <td>6/14/01 1500</td> <td></td> <td></td> </tr> <tr> <td>2</td> <td></td> <td></td> <td></td> </tr> <tr> <td>3</td> <td></td> <td></td> <td></td> </tr> <tr> <td>4</td> <td></td> <td></td> <td></td> </tr> </tbody> </table> | Relinquished By | (Date / Time) | Received By | (Date / Time) | 1 <i>[Signature]</i> | 6/14/01 1500 | | | 2 | | | | 3 | | | | 4 | | | |
|--|--|--|-----------------|---------------|-------------|---------------|----------------------|--------------|--|--|---|--|--|--|---|--|--|--|---|--|--|--|
| Relinquished By | (Date / Time) | Received By | (Date / Time) | | | | | | | | | | | | | | | | | | | |
| 1 <i>[Signature]</i> | 6/14/01 1500 | | | | | | | | | | | | | | | | | | | | | |
| 2 | | | | | | | | | | | | | | | | | | | | | | |
| 3 | | | | | | | | | | | | | | | | | | | | | | |
| 4 | | | | | | | | | | | | | | | | | | | | | | |

| SAMPLE No. | MATRIX/ SAMPLER | CONC/ TYPE | ANALYSIS/ TURNAROUND | TAG No./ PRESERVATIVE | STATION LOCATION | SAMPLE COLLECT DATE/TIME | SAMPLE No. | QC Type |
|------------|-----------------------|---------------|-------------------------|----------------------------------|---------------------|-----------------------------|------------|------------|
| PV-004-VO | Other/ Art Masters | L/G | ASBESTOS (45) | 4A-103074 (Not preserved) (1) | PV-004-VO | S: 6/6/2001 13:32 | | - |
| PV-005-VO | Other/ Art Masters | L/G | ASBESTOS (45) | 4A-103075 (Not preserved) (1) | PV-005-VO | S: 6/6/2001 13:34 | | - |
| PV-006-VO | Other/ Art Masters | L/G | ASBESTOS (45) | 4A-103076 (Not preserved) (1) | PV-006-VO | S: 6/6/2001 13:35 | | - |
| PV-007-VO | Other/ Art Masters | L/G | ASBESTOS (45) | 4A-103077 (Not preserved) (1) | PV-007-VO | S: 6/6/2001 13:45 | | - |
| PV-123-VO | Other/ Art Masters | L/C | ASBESTOS (45) | 4A-103071 (Not preserved) (1) | PV-123-VO | S: 6/6/2001 13:30 | | - |

| | | | |
|-------------------------------|--|---|-------------------------------|
| Shipment for Case Complete? Y | Sample(s) to be used for laboratory QC: | Additional Sampler Signature(s): | Chain of Custody Seal Number: |
| Analysis Key: | Concentration: L = Low, M = Low/Medium, H = High | Type/Designate: Composite = C, Grab = G | Shipment Iced? _____ |

ASBESTOS = Asbestos

TR Number: 4-473322073-061401-0001

PR provides preliminary results. Requests for preliminary results will increase analytical costs.

Send Copy to: Contract Laboratory Analytical Services Support, 2000 Edmund Halley Dr., Reston, VA. 20191-3436 Phone 703/264-6348 Fax 703/264-9222

REGION COPY

EPA US EPA SESD Athens GA
Generic Chain of Custody

Copy

Reference Case:

R

Client No:

| | | | |
|--|--|---|---------------------------------------|
| Region: 4 Project Code: 01-0811 Account Code: 50102D04ZZQB00 CERCLIS ID: Spill ID: Site Name/State: Carolina Vermiculite/SC Project Leader: Kevin Simmons Action: Sampling Co: US EPA SESD | Date Shipped: 6/14/2001 Carrier Name: FedEx Airbill: Shipped to: EMSL Analytical Inc 107 Haddon Ave Westmont NJ 08108 (856) 858-4800 | Chain of Custody Record Relinquished By (Date / Time) Received By (Date / Time) 1 <i>[Signature]</i> 6/14/01 1500 2 3 4 | Sampler Signature: <i>[Signature]</i> |
|--|--|---|---------------------------------------|

| SAMPLE No. | MATRIX/ SAMPLER | CONC/ TYPE | ANALYSIS/ TURNAROUND | TAG No./ PRESERVATIVE | STATION LOCATION | SAMPLE COLLECT DATE/TIME | SAMPLE No. | QC Type |
|------------|--------------------------------|---------------|-------------------------|----------------------------------|---------------------|-----------------------------|------------|------------|
| CV-001-VO | Other/ Kevin Simmons | L/G | ASBESTOS (45) | 4A-103065 (Not preserved) (1) | CV-001-VO | S: 6/6/2001 10:52 | | - |
| CV-002-VO | Other/ Kevin Simmons | L/G | ASBESTOS (45) | 4A-103066 (Not preserved) (1) | CV-002-VO | S: 6/6/2001 11:00 | | - |
| CV-003-SS | Surface Soil/ Kevin Simmons | L/G | ASBESTOS (45) | 4A-103067 (Not preserved) (1) | CV-003-SS | S: 6/6/2001 11:15 | | - |
| CV-004-VO | Other/ Kevin Simmons | L/G | ASBESTOS (45) | 4A-103068 (Not preserved) (1) | CV-004-VO | S: 6/6/2001 11:40 | | - |
| CV-005-VO | Other/ Kevin Simmons | L/G | ASBESTOS (45) | 4A-103069 (Not preserved) (1) | CV-005-VO | S: 6/6/2001 12:10 | | - |

| | | | |
|-------------------------------|--|---|-------------------------------|
| Shipment for Case Complete? Y | Sample(s) to be used for laboratory QC: | Additional Sampler Signature(s): | Chain of Custody Seal Number: |
| Analysis Key: | Concentration: L = Low, M = Low/Medium, H = High | Type/Designate: Composite = C, Grab = G | Shipment Iced? _____ |

ASBESTOS = Asbestos

TR Number: 4-473322073-061401-0002

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PR provides preliminary results. Requests for preliminary results will increase analytical costs.

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EMSL Analytical, Inc.

107 Haddon Ave., Westmont, NJ 08108

Phone: (856) 858-4800 Fax: (856) 858-4960 Email: eslegal@EMSL.com



Attn: Jim Gray
 U.S. EPA
 Environmental Services Division
 College Station Rd
 Athens, GA 30613-7799

Fax: (706) 355-8744 Phone: 706-355-8613
 Project:

Customer ID: USEP50
 Customer PO:
 Received: 06/15/01 11:38 AM

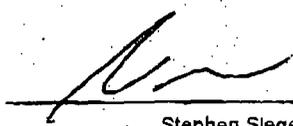
EMSL Order: 040109201
 EMSL Project ID:
 Analysis Date: 7/26/2001

Polarized Light Microscopy (PLM) Performed by NIOSH Method 9002, Issue 2

| Sample | Location | Appearance | Treatment | % Fibrous | Non-Asbestos | | Asbestos |
|--|----------|---------------------------------------|-----------|------------|--------------------------|--------|---------------|
| | | | | | % Non-Fibrous | % Type | |
| CV-004-VO (DUPLICATE) 040109201-0011 | | Brown Non-Fibrous Heterogeneous | Teased | | 100% Non-fibrous (other) | | None Detected |
| LAB BLANK NIST FIBERGLASS (NBS 1866) 040109201-0012 | | Pink Fibrous Homogeneous | Teased | 100% Glass | | | None Detected |

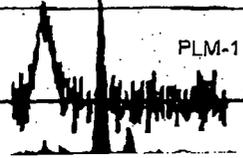
Analyst(s)

Linda Price (1)
 Scott Combs (11)



Stephen Siegel, CIH
 or other approved signatory

Disclaimers: PLM has been known to miss asbestos in a small percentage of samples which contain asbestos. Thus negative PLM results cannot be guaranteed. EMSL suggests that samples reported as <1% or none detected be tested with either SEM or TEM. The above test report relates only to the items tested. This report may not be reproduced, except in full, without written approval by EMSL. The above test must not be used by the client to claim product endorsement by NVLAP nor any agency of the United States Government. Laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.



EMSL Analytical, Inc.

107 Haddon Ave., Westmont, NJ 08108

Phone: (856) 858-4800 Fax: (856) 858-4960 Email: salegel@EMSL.com



Attn: Jim Gray
U.S. EPA
Environmental Services Division
College Station Rd
Athens, GA 30613-7799

Customer ID: USEP50
Customer PO:
Received: 06/15/01 11:38 AM

Fax: (706) 355-8744 Phone: 706-355-8613

EMSL Order: 040109201
EMSL Project ID:
Analysis Date: 7/26/2001

Project:

Polarized Light Microscopy (PLM) Performed by NIOSH Method 9002, Issue 2

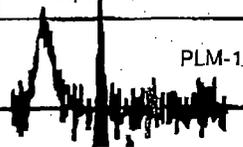
| Sample | Location | Appearance | Treatment | Non-Asbestos | | Asbestos |
|-----------------------------|----------|---|-------------------|--------------------------------------|--------------------------|---------------|
| | | | | % Fibrous | % Non-Fibrous | % Type |
| PV-004-VO 040109201-0001 | | Brown/Gray/Gold Non-Fibrous Heterogeneous | Teased | <1% Cellulose | 100% Non-fibrous (other) | None Detected |
| PV-005-VO 040109201-0002 | | Gray/Brown/Gold Non-Fibrous Heterogeneous | Teased | <1% Cellulose | 100% Non-fibrous (other) | None Detected |
| PV-006-VO 040109201-0003 | | Various Non-Fibrous Heterogeneous | Teased | <1% Cellulose | 100% Non-fibrous (other) | None Detected |
| PV-007-VO 040109201-0004 | | Tan/Gold/Gray Non-Fibrous Heterogeneous | Teased | | 100% Non-fibrous (other) | None Detected |
| PV-123-VO 040109201-0005 | | Gray/Gold/Tan Non-Fibrous Heterogeneous | Teased | <1% Cellulose | 100% Non-fibrous (other) | None Detected |
| CV-001-VO 040109201-0006 | | Gray/Brown/Gold Non-Fibrous Heterogeneous | Teased | <1% Cellulose | 100% Non-fibrous (other) | None Detected |
| CV-002-VO 040109201-0007 | | Tan/Gold/Gray Non-Fibrous Heterogeneous | Teased | <1% Cellulose | 100% Non-fibrous (other) | None Detected |
| CV-003-VO 040109201-0008 | | Tan/Gray/Gold Non-Fibrous Heterogeneous | Teased | <1% Cellulose <1% Fibrous (other) | 100% Non-fibrous (other) | None Detected |
| CV-004-VO 040109201-0009 | | Gray/Brown/Gold Non-Fibrous Heterogeneous | Teased | <1% Cellulose <1% Fibrous (other) | 100% Non-fibrous (other) | None Detected |
| CV-005-VO 040109201-0010 | | Gray/Rust/Gold Non-Fibrous Heterogeneous | Teased Crushed | <1% Cellulose <1% Fibrous (other) | 100% Non-fibrous (other) | None Detected |

Analyst(s)

Linda Price (1)
Scott Combs (11)

Stephen Siegel, CIH
or other approved signatory

Disclaimers: PLM has been known to miss asbestos in a small percentage of samples which contain asbestos. Thus negative PLM results cannot be guaranteed. EMSL suggests that samples reported as <1% or none detected be tested with either SEM or TEM. The above test report relates only to the items tested. This report may not be reproduced, except in full, without written approval by EMSL. The above test must not be used by the client to claim product endorsement by NVLAP nor any agency of the United States Government. Laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.



EMSL Analytical Inc.
 107 Haddon Avenue
 Westmont, NJ 08108
 Contacts: Stephen Siegel, CIH, Scott Slavin, Ph.D
 Phone:856-858-4800 Fax:856-858-4960

Report Date 7/25/2001
 Project Name Region 4 Vermiculite
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos In Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)
 EMSL Order ID 040109201

Date Started 6/25/2001
 Date Completed 7/24/2001
 Analyst AS
 Lab Sample# 040109201-0005
 Field Subsample# PW-123-VO
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

Tem Analysis
 Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 19,000 X
 Grid Opening Area (sq mm) 0.0061
 Number of Grid Openings Scanned 10
 Asbestos Structure Size and Type Categories of Interest
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile
 Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category 5u Length
 <0.5u Diameter

Dust Generator
 Mass of Sample Tumbled(g) 60.51
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g) 0.000154

| Asbestos Analysis Results | Number or Protocol Structures | |
|---------------------------------------|-------------------------------|-------------|
| | Total | Long(>10um) |
| No. of Chrysotile Asbestos Structures | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 |
| Amphibole Mineral Type(s) | | |

ESTIMATED ASBESTOS CONCENTRATIONS (s/gPM10)

| | Concentrations | |
|---|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 4.098E+07 | < 8.033E+07 |
| Long Chrysotile Protocol Structures | < 4.098E+07 | < 8.033E+07 |
| Total Amphibole Protocol Structures | < 4.098E+07 | < 8.033E+07 |
| Long Amphibole Protocol Structures | < 4.098E+07 | < 8.033E+07 |
| Long Asbestos Protocol Structures | < 4.098E+07 | < 8.033E+07 |
| Total Asbestos Protocol Structures | < 4.098E+07 | < 8.033E+07 |
| Estimated Analytical Sensitivity: (s/gPM10) | 4.098E+07 | 8.033E+07 |

EMSL Analytical Inc.
 107 Haddon Avenue
 Westmont, NJ 08108
 Contacts: Stephen Siegel, CIH, Scott Slavin, Ph.D
 Phone:856-858-4800 Fax:856-858-4960

Report Date 7/25/2001
 Project Name Region 4 Vermiculite
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos In Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)
 EMSL Order ID 040109201

Date Started 6/25/2001
 Date Completed 7/24/2001
 Analyst AS

Lab Sample# 040109201-0001
 Field Subsample# PV-004-VO
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

Tem Analysis
 Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 19,000 X
 Grid Opening Area (sq mm) 0.0061
 Number of Grid Openings Scanned 0
 Asbestos Structure Size and Type Categories of Interest
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category 5u Length
 <0.5u Diameter

Dust Generator
 Mass of Sample Tumbled(g) 62.6
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g) 0

| Asbestos Analysis Results | Number of Protocol Structures | |
|---------------------------------------|-------------------------------|-------------|
| | Total | Long(>10um) |
| No. of Chrysotile Asbestos Structures | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 |
| Amphibole Mineral Type(s) | | |

ESTIMATED ASBESTOS CONCENTRATIONS (s/gPM10)

| | Concentrations | |
|---|----------------|-----------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < #DIV/0! | < #DIV/0! |
| Long Chrysotile Protocol Structures | < #DIV/0! | < #DIV/0! |
| Total Amphibole Protocol Structures | < #DIV/0! | < #DIV/0! |
| Long Amphibole Protocol Structures | < #DIV/0! | < #DIV/0! |
| Long Asbestos Protocol Structures | < #DIV/0! | < #DIV/0! |
| Total Asbestos Protocol Structures | < #DIV/0! | < #DIV/0! |
| Estimated Analytical Sensitivity: (s/gPM10) | #DIV/0! | #DIV/0! |

EMSL Analytical Inc.
 107 Haddon Avenue
 Westmont, NJ 08108
 Contacts: Stephen Slegel, CIH, Scott Slavin, Ph.D
 Phone:856-858-4800 Fax:856-858-4960

Report Date 7/25/2001
 Project Name Region 4 Vermiculite
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos in Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)
 EMSL Order ID 040109201

Date Started 6/25/2001
 Date Completed 7/24/2001
 Analyst AS
 Lab Sample# 040109201-0002
 Field Subsample# PV-005-VO
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

Tem Analysis

Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 19,000 X
 Grid Opening Area (sq mm) 0.0061
 Number of Grid Openings Scanned 0
 Asbestos Structure Size and Type Categories of Interest Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category

5u Length
 <0.5u Diameter

Dust Generator

Mass of Sample Tumbled(g) 58.91
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator

Mass of Respirable Dust on Filter(g) 0

| | Number of Protocol Structures | |
|---------------------------------------|-------------------------------|-------------|
| | Total | Long(>10um) |
| Asbestos Analysis Results | | |
| No. of Chrysotile Asbestos Structures | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 |
| Amphibole Mineral Type(s) | | |

ESTIMATED ASBESTOS CONCENTRATIONS (s/gPM10)

| | Concentrations | |
|---|----------------|-----------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < #DIV/0! | < #DIV/0! |
| Long Chrysotile Protocol Structures | < #DIV/0! | < #DIV/0! |
| Total Amphibole Protocol Structures | < #DIV/0! | < #DIV/0! |
| Long Amphibole Protocol Structures | < #DIV/0! | < #DIV/0! |
| Long Asbestos Protocol Structures | < #DIV/0! | < #DIV/0! |
| Total Asbestos Protocol Structures | < #DIV/0! | < #DIV/0! |
| Estimated Analytical Sensitivity: (s/gPM10) | #DIV/0! | #DIV/0! |

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Report Date 7/25/2001
 Project Name Region 4 Vermiculite
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos in Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)
 EMSL Order ID 040109201

Date Started 6/25/2001
 Date Completed 7/24/2001
 Analyst AS

Lab Sample# 040109201-0003
 Field Subsample# PV-008-VO
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

TEM Analysis

Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 19,000 X
 Grid Opening Area (sq mm) 0.0081
 Number of Grid Openings Scanned 10
 Asbestos Structure Size and Type Categories of Interest
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile
 Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category 5u Length
 <0.5u Diameter

Dust Generator

Mass of Sample Tumbled(g) 62.25
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g) 0.000163

| | <u>Total</u> | <u>Number of Protocol Structures</u> <u>Long(>10um)</u> |
|---------------------------------------|--------------|---|
| Asbestos Analysis Results | | |
| No. of Chrysotile Asbestos Structures | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 |
| Amphibole Mineral Type(s) | | |

ESTIMATED ASBESTOS CONCENTRATIONS (s/gPM10)

| | <u>Concentrations</u> | |
|---|-----------------------|----------------|
| | <u>Mean</u> | <u>95% UCL</u> |
| Total Chrysotile Protocol Structures | < 3.872E+07 | < 7.589E+07 |
| Long Chrysotile Protocol Structures | < 3.872E+07 | < 7.589E+07 |
| Total Amphibole Protocol Structures | < 3.872E+07 | < 7.589E+07 |
| Long Amphibole Protocol Structures | < 3.872E+07 | < 7.589E+07 |
| Long Asbestos Protocol Structures | < 3.872E+07 | < 7.589E+07 |
| Total Asbestos Protocol Structures | < 3.872E+07 | < 7.589E+07 |
| Estimated Analytical Sensitivity: (s/gPM10) | 3.872E+07 | 7.589E+07 |

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Report Date 7/25/2001
 Project Name Region 4 Vermiculite
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos in Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)
 EMSL Order ID 040109201

Date Started 6/25/2001
 Date Completed 7/24/2001
 Analyst AS
 Lab Sample# 040109201-0004
 Field Subsample# PV-007-VO
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

Tem Analysis
 Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 19,000 X
 Grid Opening Area (sq mm) 0.0061
 Number of Grid Openings Scanned 0
 Asbestos Structure Size and Type Categories of Interest
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile
 Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category 5u Length
 <0.5u Diameter

Dust Generator
 Mass of Sample Tumbled(g) 6.32
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g) 0

| Asbestos Analysis Results | Number of Protocol Structures | |
|---------------------------------------|-------------------------------|-------------|
| | Total | Long(>10um) |
| No. of Chrysotile Asbestos Structures | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 |
| Amphibole Mineral Type(s) | | |

ESTIMATED ASBESTOS CONCENTRATIONS (s/gPM10)

| | Concentrations | |
|---|----------------|-----------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < #DIV/0! | < #DIV/0! |
| Long Chrysotile Protocol Structures | < #DIV/0! | < #DIV/0! |
| Total Amphibole Protocol Structures | < #DIV/0! | < #DIV/0! |
| Long Amphibole Protocol Structures | < #DIV/0! | < #DIV/0! |
| Long Asbestos Protocol Structures | < #DIV/0! | < #DIV/0! |
| Total Asbestos Protocol Structures | < #DIV/0! | < #DIV/0! |
| Estimated Analytical Sensitivity: (s/gPM10) | #DIV/0! | #DIV/0! |

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Report Date 7/25/2001
 Project Name Region 4 Vermiculite
 Methods Draft Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material Method (dated May 23, 2000, Revision 1)
 EMSL Order ID 040109201

Date Started 6/25/2001
 Date Completed 7/24/2001
 Analyst AS

Lab Sample# 040109201-0006
 Field Subsample# CV-001-VO
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

Tem Analysis
 Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 19,000 X
 Grid Opening Area (sq mm) 0.0061
 Number of Grid Openings Scanned 10
 Asbestos Structure Size and Type Categories of Interest Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category 5u Length
 <0.5u Diameter

Dust Generator
 Mass of Sample Tumbled(g) 61.13
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g) 0.000165

| Asbestos Analysis Results | Total | Number or Protocol Structures | |
|---------------------------------------|-------|-------------------------------|---|
| | | Long(>10um) | |
| No. of Chrysotile Asbestos Structures | 0 | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 | 0 |
| Amphibole Mineral Type(s) | | | |

ESTIMATED ASBESTOS CONCENTRATIONS (s/gPM10)

| | Concentrations | |
|---|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 3.825E+07 | < 7.497E+07 |
| Long Chrysotile Protocol Structures | < 3.825E+07 | < 7.497E+07 |
| Total Amphibole Protocol Structures | < 3.825E+07 | < 7.497E+07 |
| Long Amphibole Protocol Structures | < 3.825E+07 | < 7.497E+07 |
| Long Asbestos Protocol Structures | < 3.825E+07 | < 7.497E+07 |
| Total Asbestos Protocol Structures | < 3.825E+07 | < 7.497E+07 |
| Estimated Analytical Sensitivity: (s/gPM10) | 3.825E+07 | 7.497E+07 |

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Report Date 7/25/2001
 Project Name Region 4 Vermiculite
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos in Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)
 EMSL Order ID 040109201

Date Started 6/25/2001
 Date Completed 7/24/2001
 Analyst AS
 Lab Sample# 040109201-0007
 Field Subsample# CV-002-VO
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

Tem Analysis
 Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 19,000 X
 Grid Opening Area (sq mm) 0.0061
 Number of Grid Openings Scanned 10
 Asbestos Structure Size and Type Categories of Interest
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile
 Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category 5u Length
 <0.5u Diameter

Dust Generator
 Mass of Sample Tumbled(g) 61.45
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g) 0.000016

| Asbestos Analysis Results | Number of Protocol Structures | |
|---------------------------------------|-------------------------------|-------------|
| | Total | Long(>10um) |
| No. of Chrysotile Asbestos Structures | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 |
| Amphibole Mineral Type(s) | | |

ESTIMATED ASBESTOS CONCENTRATIONS (s/gPM10)

| | Concentrations | |
|---|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 3.945E+08 | < 7.732E+08 |
| Long Chrysotile Protocol Structures | < 3.945E+08 | < 7.732E+08 |
| Total Amphibole Protocol Structures | < 3.945E+08 | < 7.732E+08 |
| Long Amphibole Protocol Structures | < 3.945E+08 | < 7.732E+08 |
| Long Asbestos Protocol Structures | < 3.945E+08 | < 7.732E+08 |
| Total Asbestos Protocol Structures | < 3.945E+08 | < 7.732E+08 |
| Estimated Analytical Sensitivity: (s/gPM10) | 3.945E+08 | 7.732E+08 |

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Report Date 7/25/2001
 Project Name Region 4 Vermiculite
 Methods Draft Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material Method (dated May 23, 2000, Revision 1)
 EMSL Order ID 040109201

Date Started 6/25/2001
 Date Completed 7/24/2001
 Analyst AS
 Lab Sample# 040109201-0008
 Field Subsample# CV-003-VO
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

Tem Analysis
 Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 19,000 X
 Grid Opening Area (sq mm) 0.0061
 Number of Grid Openings Scanned 10
 Asbestos Structure Size and Type Categories of Interest
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile
 Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile
 Minimum Acceptable Structure Identification Category 5u Length
 <0.5u Diameter

Dust Generator
 Mass of Sample Tumbled(g) 61.02
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g) 0.000031

| Asbestos Analysis Results | Number of Protocol Structures | |
|---------------------------------------|-------------------------------|-------------|
| | Total | Long(>10um) |
| No. of Chrysotile Asbestos Structures | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 |
| Amphibole Mineral Type(s) | | |

ESTIMATED ASBESTOS CONCENTRATIONS (s/gPM10)

| | Concentrations | |
|---|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 2.036E+08 | < 3.990E+08 |
| Long Chrysotile Protocol Structures | < 2.036E+08 | < 3.990E+08 |
| Total Amphibole Protocol Structures | < 2.036E+08 | < 3.990E+08 |
| Long Amphibole Protocol Structures | < 2.036E+08 | < 3.990E+08 |
| Long Asbestos Protocol Structures | < 2.036E+08 | < 3.990E+08 |
| Total Asbestos Protocol Structures | < 2.036E+08 | < 3.990E+08 |
| Estimated Analytical Sensitivity: (s/gPM10) | 2.036E+08 | 3.990E+08 |

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Report Date 7/25/2001
 Project Name Region 4 Vermiculite
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos in Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)

EMSL Order ID 040109201

Date Started 6/25/2001
 Date Completed 7/24/2001
 Analyst AS

Lab Sample# 040109201-0009
 Field Subsample# CV-004-VO
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

Tem Analysis

Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 19,000 X
 Grid Opening Area (sq mm) 0.0061
 Number of Grid Openings Scanned 10
 Asbestos Structure Size and Type Categories of Interest Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category 5u Length
 <0.5u Diameter

Dust Generator

Mass of Sample Tumbled(g) 60.71
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator

Mass of Respirable Dust on Filter(g) 0.000079

| | Number or Protocol Structures | |
|---------------------------------------|-------------------------------|-------------|
| | Total | Long(>10um) |
| Asbestos Analysis Results | | |
| No. of Chrysotile Asbestos Structures | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 |
| Amphibole Mineral Type(s) | | |

ESTIMATED ASBESTOS CONCENTRATIONS (s/gPM10)

| | Concentrations | |
|---|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 7.989E+07 | < 1.566E+08 |
| Long Chrysotile Protocol Structures | < 7.989E+07 | < 1.566E+08 |
| Total Amphibole Protocol Structures | < 7.989E+07 | < 1.566E+08 |
| Long Amphibole Protocol Structures | < 7.989E+07 | < 1.566E+08 |
| Long Asbestos Protocol Structures | < 7.989E+07 | < 1.566E+08 |
| Total Asbestos Protocol Structures | < 7.989E+07 | < 1.566E+08 |
| Estimated Analytical Sensitivity: (s/gPM10) | 7.989E+07 | 1.566E+08 |

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Report Date 7/25/2001
 Project Name Region 4 Vermiculite
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos in Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)
 EMSL Order ID 040109201

Date Started 6/25/2001
 Date Completed 7/24/2001
 Analyst AS

Lab Sample# 040109201-0010
 Field Subsample# CV-005-VO
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

Tem Analysis

Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 19,000 X
 Grid Opening Area (sq mm) 0.0061
 Number of Grid Openings Scanned 10
 Asbestos Structure Size and Type Categories of Interest Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category 5u Length
 <0.5u Diameter

Dust Generator

Mass of Sample Tumbled(g) 80.64
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator

Mass of Respirable Dust on Filter(g) 0.000138

| | Number or Protocol Structures | |
|---------------------------------------|-------------------------------|-------------|
| | Total | Long(>10um) |
| Asbestos Analysis Results | | |
| No. of Chrysotile Asbestos Structures | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 |
| Amphibole Mineral Type(s) | | |

ESTIMATED ASBESTOS CONCENTRATIONS (s/gPM10)

| | Concentrations | |
|---|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 4.574E+07 | < 8.964E+07 |
| Long Chrysotile Protocol Structures | < 4.574E+07 | < 8.964E+07 |
| Total Amphibole Protocol Structures | < 4.574E+07 | < 8.964E+07 |
| Long Amphibole Protocol Structures | < 4.574E+07 | < 8.964E+07 |
| Long Asbestos Protocol Structures | < 4.574E+07 | < 8.964E+07 |
| Total Asbestos Protocol Structures | < 4.574E+07 | < 8.964E+07 |
| Estimated Analytical Sensitivity: (s/gPM10) | 4.574E+07 | 8.964E+07 |

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Report Date 7/27/2001
 Project Name Region 4 Vermiculite
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos in Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)
 EMSL Order ID 040109201

Date Started 6/25/2001
 Date Completed 7/25/2001
 Analyst ES

Lab Sample# 040109201-0013
 Field Subsample# CV-003-VO (QC)
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

Test Analysis
 Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 19,000 X
 Grid Opening Area (sq mm) 0.0061
 Number of Grid Openings Scanned 10
 Asbestos Structure Size and Type Categories of Interest
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile
 Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile
 Minimum Acceptable Structure Identification Category 5u Length
 <0.5u Diameter

Dust Generator
 Mass of Sample Tumbled(g) 61.02
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube (IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g) 0.000031

| Asbestos Analysis Results | Number or Protocol Structures | |
|---------------------------------------|-------------------------------|-------------|
| | Total | Long(>10um) |
| No. of Chrysotile Asbestos Structures | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 |
| Amphibole Mineral Type(s) | | |

ESTIMATED ASBESTOS CONCENTRATIONS (s/gPM10)

| | Concentrations | |
|---|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 2.036E+08 | < 3.990E+08 |
| Long Chrysotile Protocol Structures | < 2.036E+08 | < 3.990E+08 |
| Total Amphibole Protocol Structures | < 2.036E+08 | < 3.990E+08 |
| Long Amphibole Protocol Structures | < 2.036E+08 | < 3.990E+08 |
| Long Asbestos Protocol Structures | < 2.036E+08 | < 3.990E+08 |
| Total Asbestos Protocol Structures | < 2.036E+08 | < 3.990E+08 |
| Estimated Analytical Sensitivity: (s/gPM10) | 2.036E+08 | 3.990E+08 |



**US EPA SEDS Athens GA
Generic Chain of Custody**

USEP50
040112849

Reference Case
Client No: _____
SDG No: _____

L

| | | | | | |
|---|--------------------------------|---------------|---------------------------------------|-------------------------|------------------------|
| Date Shipped: Carrier Name: FedEx Airbill: Shipped to: | Chain of Custody Record | | Sampler Signature: <i>[Signature]</i> | For Lab Use Only | |
| | Relinquished By | (Date / Time) | Received By | (Date / Time) | Lab Contract No: _____ |
| | 1 <i>[Signature]</i> | 8/6/01 12:00 | <i>[Signature]</i> | | Unit Price: _____ |
| | 2 | | | | Transfer To: _____ |
| | 3 | | | | Lab Contract No: _____ |
| 4 | | | | Unit Price: _____ | |

| SAMPLE No. | MATRIX/ SAMPLER | CONC/ TYPE | ANALYSIS/ TURNAROUND | TAG No./ PRESERVATIVE | STATION LOCATION | SAMPLE COLLECT | | FOR LAB USE ONLY | |
|------------|--------------------------------|---------------|-------------------------|-------------------------------|---------------------|----------------|--------------|------------------|-----------------------------|
| | | | | | | DATE/TIME | | SAMPLE No. | Sample Condition On Receipt |
| WR-001-VO | Other/ Kevin Simmons | L/G | ASBESTOS (45) | 4A-103078 (Not preserved) (1) | WR-001-VO | S: | 6/6/01 15:10 | | |
| WR-002-VO | Other/ Kevin Simmons | L/G | ASBESTOS (45) | 4A-103079 (Not preserved) (1) | WR-002-VO | S: | 6/6/01 15:40 | | |
| WR-003-VO | Other/ Kevin Simmons | L/G | ASBESTOS (45) | 4A-103080 (Not preserved) (1) | WR-003-VO | S: | 6/6/01 16:10 | | |
| WR-004-VO | Other/ Kevin Simmons | L/G | ASBESTOS (45) | 4A-103081 (Not preserved) (1) | WR-004-VO | S: | 6/6/01 16:25 | | |
| WR-005-VO | Other/ Kevin Simmons | L/G | ASBESTOS (45) | 4A-103082 (Not preserved) (1) | WR-005-VO | S: | 6/6/01 16:35 | | |
| WR-006-VO | Other/ Kevin Simmons | L/G | ASBESTOS (45) | 4A-103083 (Not preserved) (1) | WR-006-VO | S: | 6/6/01 16:40 | | |
| WR-007-SS | Surface Soil/ Kevin Simmons | L/G | ASBESTOS (45) | 4A-103084 (Not preserved) (1) | WR-007-SS | S: | 6/6/01 16:55 | | |

COPY

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WESTMONT, NJ
01 AUG - 7 AM 11:51

| | | | | |
|--|--|---|---|---|
| Shipment for Case Complete? <input type="checkbox"/> | Sample(s) to be used for laboratory QC: | Additional Sampler Signature(s): | Cooler Temperature Upon Receipt: | Chain of Custody Seal Number: |
| Analysis Key: ASBESTOS = Asbestos | Concentration: L = Low, M = Low/Medium, H = High | Type/Designate: Composite = C, Grab = G | Custody Seal Intact? <input type="checkbox"/> | Shipment Iced? <input type="checkbox"/> |

TR Number: 4-473322073-061901-0001

LABORATORY COPY

EMSL Analytical, Inc.

107 Haddon Ave., Westmont, NJ 08108

Phone: (858) 858-4800 Fax: (856) 868-4960 Email: ssiege@EMSL.com



Attn: Jim Gray
U.S. EPA
Environmental Services Division
College Station Rd
Athens, GA 30613-7799

Customer ID: USEP50
Customer PO:
Received: 06/15/01 11:38 AM

Fax: (706) 355-8744 Phone: 706-355-8613

EMSL Order: 040109201

Project:

EMSL Project ID:

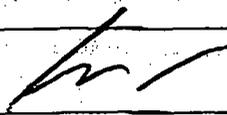
Analysis Date: 7/26/2001

Polarized Light Microscopy (PLM) Performed by NIOSH Method 9002, Issue 2

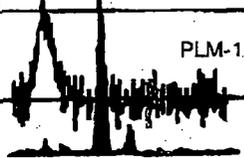
| Sample | Location | Appearance | Treatment | Non-Asbestos | | Asbestos |
|-----------------------------|----------|---|-------------------|--------------------------------------|--------------------------|---------------|
| | | | | % Fibrous | % Non-Fibrous | % Type |
| PV-004-VO 040109201-0001 | | Brown/Gray/Gold Non-Fibrous Heterogeneous | Teased | <1% Cellulose | 100% Non-fibrous (other) | None Detected |
| PV-005-VO 040109201-0002 | | Gray/Brown/Gold Non-Fibrous Heterogeneous | Teased | <1% Cellulose | 100% Non-fibrous (other) | None Detected |
| PV-006-VO 040109201-0003 | | Various Non-Fibrous Heterogeneous | Teased | <1% Cellulose | 100% Non-fibrous (other) | None Detected |
| PV-007-VO 040109201-0004 | | Tan/Gold/Gray Non-Fibrous Heterogeneous | Teased | | 100% Non-fibrous (other) | None Detected |
| PV-123-VO 040109201-0005 | | Gray/Gold/Tan Non-Fibrous Heterogeneous | Teased | <1% Cellulose | 100% Non-fibrous (other) | None Detected |
| CV-001-VO 040109201-0006 | | Gray/Brown/Gold Non-Fibrous Heterogeneous | Teased | <1% Cellulose | 100% Non-fibrous (other) | None Detected |
| CV-002-VO 040109201-0007 | | Tan/Gold/Gray Non-Fibrous Heterogeneous | Teased | <1% Cellulose | 100% Non-fibrous (other) | None Detected |
| CV-003-VO 040109201-0008 | | Tan/Gray/Gold Non-Fibrous Heterogeneous | Teased | <1% Cellulose <1% Fibrous (other) | 100% Non-fibrous (other) | None Detected |
| CV-004-VO 040109201-0009 | | Gray/Brown/Gold Non-Fibrous Heterogeneous | Teased | <1% Cellulose <1% Fibrous (other) | 100% Non-fibrous (other) | None Detected |
| CV-005-VO 040109201-0010 | | Gray/Rust/Gold Non-Fibrous Heterogeneous | Teased Crushed | <1% Cellulose <1% Fibrous (other) | 100% Non-fibrous (other) | None Detected |

Analyst(s)

Linda Price (1)
Scott Combs (11)


Stephan Siegel, CIH
or other approved signatory

Disclaimers: PLM has been known to miss asbestos in a small percentage of samples which contain asbestos. Thus negative PLM results cannot be guaranteed. EMSL suggests that samples reported as <1% or none detected be tested with either SEM or TEM. The above test report relates only to the items tested. This report may not be reproduced, except in full, without written approval by EMSL. The above test must not be used by the client to claim product endorsement by NVLAP nor any agency of the United States Government. Laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.



EMSL Analytical, Inc.

107 Haddon Ave., Westmont, NJ 08108

Phone: (856) 858-4800 Fax: (856) 858-4980 Email: eslegal@EMSL.com



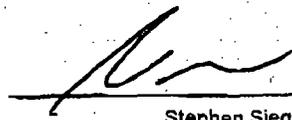
| | |
|---|---|
| Attn: Jim Gray U.S. EPA Environmental Services Division College Station Rd. Athens, GA 30613-7799 | Customer ID: USEP50 Customer PO: Received: 06/15/01 11:38 AM |
| Fax: (706) 355-8744 Phone: 706-355-8613 | EMSL Order: 040109201 EMSL Project ID: Analysis Date: 7/26/2001 |
| Project: | |

Polarized Light Microscopy (PLM) Performed by NIOSH Method 9002, Issue 2

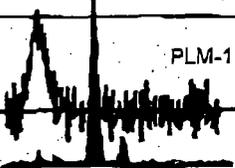
| Sample | Location | Appearance | Treatment | Non-Asbestos | | Asbestos |
|--|----------|---|-----------|--------------|--------------------------|---------------|
| | | | | % Fibrous | % Non-Fibrous | % Type |
| CV-004-VO (DUPLICATE) 040109201-0011 | | Brown Non-Fibrous Heterogeneous | Teased | | 100% Non-fibrous (other) | None Detected |
| LAB BLANK NIST FIBERGLASS (NBS 1866) 040109201-0012 | | Pink Fibrous Homogeneous | Teased | 100% Glass | | None Detected |

Analyst(s)

Linda Price (1)
Scott Combs (11)


Stephen Siegel, CIH
or other approved signatory

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September 28, 2001

Jim Gray
US EPA
College Station Rd
Athens, GA 30613-7799

RE: EMSL Order ID# 040112849

Dear Jim:

Attached please find the results of your soil samples from the above referenced order number. These samples were analyzed for asbestos content via PLM NIOSH 9002 (Issue 2) and for asbestos structure quantification via the Draft Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material Method (EPA-540-R97-028 EPA Superfund). This letter is meant to document all the structure quantities identified by the Elutriator method including those not counted/reported based on the method's requirements. A summary of the results are given in the table below, explanatory notes follow.

| <u>Customer Sample ID/ EMSL Sample ID</u> | <u>Total Asbestos Structures₁</u> | <u>Reported Asbestos Structures₂</u> | | <u>Excluded Asbestos Structures₅</u> | <u>Non- Regulated Amphiboles₆</u> |
|---|--|---|-------------------------|---|--|
| | | <u>Protocol₃</u> | <u>Long₄</u> | | |
| WR-001-VO/040112849-0001 | 0 | 0 | 0 | 0 | 12 |
| WR-002-VO/040112849-0002 | 0 | 0 | 0 | 0 | 21 |
| WR-003-VO/040112849-0003 | 0 | 0 | 0 | 0 | 21 |
| WR-004-VO/040112849-0004 | 0 | 0 | 0 | 0 | 2 |
| WR-005-VO/040112849-0005 | 0 | 0 | 0 | 0 | 5 |
| WR-006-VO/040112849-0006 | 0 | 0 | 0 | 0 | 10 |
| WR-007-SS/040112849-0007 | 0 | 0 | 0 | 0 | 6 |
| WR-007-SSQC | 0 | 0 | 0 | 0 | 10 |
| BLANK | 0 | 0 | 0 | 0 | 0 |

Notes:

1. Total asbestos structures represents all asbestos structures (fibers, buds, clusters, and matrix) found during analysis. This includes the six regulated asbestos types-Chrysotile and Amphibole Asbestos (Amosite, Actinolite, Tremolite, Crocidolite, and Anthophyllite).
2. Reported asbestos structures represent all asbestos structures that meet the reporting requirements based on size as stated in the EPA Superfund Method. These structures must be $\leq 0.5\mu$ in diameter and $\geq 5\mu$ in length.
3. Protocol asbestos structures represent all asbestos structures that meet the requirements of Notes 1 and 2 and are $5-10\mu$ in length.
4. Long asbestos structures represent all asbestos structures that meet the requirements of Notes 1 and 2 and are $>10\mu$ in length.

COPY

Notes (Continued)

5. Excluded asbestos structures represent all asbestos structures that meet the requirements of Note 1 but do not meet the size requirements of Notes 2-4.
6. Non-regulated Amphiboles represent a newer class of amphibole categories that have been identified by the USEPA Region 8 in conjunction with the Libby, MT project. These include richterite and winchite. These are also termed "Libby Amphiboles" and are not currently classified as regulated asbestos but those performing the risk assessment and exposure modeling from the sample results may take this mineral fiber data into consideration.

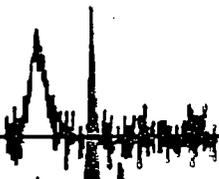
If you need any calculations based on the non-regulated amphiboles identified in these samples, please let me know and I can create additional reports showing this data. If you have any questions or need further information please do not hesitate to contact me at 800-220-3675X 1209.

Sincerely,



Stephen Siegel, CIH
Asbestos Lab Manager

COPY



EMSL Analytical, Inc.

107 Haddon Ave., Westmont, NJ 08108

Phone: (856) 858-4800 Fax: (856) 858-4960 Email: ssiege@EMSL.com



Attn: Jim Gray
U.S. EPA
Environmental Services Division
College Station Rd
Athens, GA 30613-7799

Fax: (706) 355-8744 Phone: 706-355-8613

Project: 4-473322073-0619101-0001

Customer ID: USEP50
Customer PO:
Received: 08/07/01 11:51 AM

EMSL Order: 040112849
EMSL Project ID:
Analysis Date: 6/20/2001

Polarized Light Microscopy (PLM) Performed by NIOSH Method 9002, Issue 2

| Sample | Location | Appearance | Treatment | Non-Asbestos | | Asbestos |
|-----------------------------|----------|-------------------------------------|-----------|--------------|--------------------------|------------------------------|
| | | | | % Fibrous | % Non-Fibrous | % Type |
| WR-001-VO 040112849-0001 | | Brown Non-Fibrous Homogeneous | Teased | | 100% Non-fibrous (other) | <1% Tremolite/ Actinolite |
| WR-002-VO 040112849-0002 | | Brown Non-Fibrous Homogeneous | Teased | | 100% Non-fibrous (other) | <1% Tremolite |
| WR-003-VO 040112849-0003 | | Brown Non-Fibrous Homogeneous | Teased | | 100% Non-fibrous (other) | None Detected |
| WR-004-VO 040112849-0004 | | Brown Non-Fibrous Homogeneous | Teased | | 100% Non-fibrous (other) | None Detected |
| WR-005-VO 040112849-0005 | | Brown Non-Fibrous Homogeneous | Teased | | 100% Non-fibrous (other) | <1% Tremolite |
| WR-006-VO 040112849-0006 | | Brown Non-Fibrous Homogeneous | Teased | | 100% Non-fibrous (other) | None Detected |
| WR-007-SS 040112849-0007 | | Brown Non-Fibrous Homogeneous | Teased | 1% Cellulose | 99% Non-fibrous (other) | <1% Tremolite/ Actinolite |

COPY

Analyst(s)

Linda Price (7)


Stephen Siegel, CIH
or other approved signatory

Disclaimers: PLM has been known to miss asbestos in a small percentage of samples which contain asbestos. Thus negative PLM results cannot be guaranteed. EMSL suggests that samples reported as <1% or none detected be tested with either SEM or TEM. The above test report relates only to the items tested. This report may not be reproduced, except in full, without written approval by EMSL. The above test must not be used by the client to claim product endorsement by NVLAP nor any agency of the United States Government. Laboratory is not responsible for the accuracy of results when requested to physically separate and analyze layered samples.

EMSL Analytical Inc.
 107 Haddon Avenue
 Westmont, NJ 08108
 Contacts: Stephen Siegel, CIH, Scott Slavin, Ph.D
 Phone: 856-858-4800 Fax: 856-858-4860

Report Date 9/28/2001
 Project Name 4-473322073-0819101-0001
 Methods Draft Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material Method (dated May 23, 2000, Revision 1)

EMSL Order ID 040112849

Date Started
 Date Completed
 Analyst

9/10/2001
 9/26/2001
 AS

Lab Sample#
 Field Subsample#
 Field Preparation Technique
 Sample Drying
 Sample Spitting
 Other

040112849-0001
 WR-001-VO
 N/A
 Yes
 N/A
 N/A

Tem Analysis

Effective Area of Analytical Filter (sq mm)
 Magnification
 Grid Opening Area (sq mm)
 Number of Grid Openings Scanned
 Asbestos Structure Size and Type Categories of Interest

385 (ME)
 18,000 X
 0.0081
 10
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile
 Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category

5u Length
 <0.5u Diameter

Dust Generator

Mass of Sample Tumbled(g)
 Air Flow Rate Through ME opening of Dust Generator (ml/min)
 Air Flow Rate Through IST opening of Dust Generator (ml/min)
 Estimated Total Air Flow Rate Through Elutriator (ml/min)

60.42
 1430
 72
 1502

Filters from the Isokinetic Sampling Tube (IST) opening of the Elutriator

Mass of Respirable Dust on Filter(g) 0.000175

Asbestos Analysis Results

No. of Chrysotile Asbestos Structures
 No. of Amphibole Asbestos Structures
 Amphibole Mineral Type(s)

| Total | Number of Protocol Structures | |
|-------|-------------------------------|--|
| | Long(>10um) | |

| | |
|---|---|
| 0 | 0 |
| 0 | 0 |

ESTIMATED ASBESTOS CONCENTRATIONS (e/gPM10)

| | Concentrations | |
|---|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 3.807E+07 | < 7.069E+07 |
| Long Chrysotile Protocol Structures | < 3.807E+07 | < 7.069E+07 |
| Total Amphibole Protocol Structures | < 3.807E+07 | < 7.069E+07 |
| Long Amphibole Protocol Structures | < 3.807E+07 | < 7.069E+07 |
| Long Asbestos Protocol Structures | < 3.807E+07 | < 7.069E+07 |
| Total Asbestos Protocol Structures | < 3.807E+07 | < 7.069E+07 |
| Estimated Analytical Sensitivity: (e/gPM10) | 3.807E+07 | 7.069E+07 |

EMSL Analytical Inc.
 107 Haddon Avenue
 Westmont, NJ 08108
 Contacts: Stephen Siegel, CIH, Scott Slavin, Ph.D
 Phone: 856-858-4800 Fax: 856-858-4880

Report Date 9/28/2001
 Project Name 4473322073-0619101-0001
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos in Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)
 EMSL Order ID 040112849

Date Started 9/10/2001
 Date Completed 9/26/2001
 Analyst AS

Lab Sample# 040112849-0002
 Field Subsample# WR-002-VO
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

Test Analysis
 Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 18,000 X
 Grid Opening Area (sq mm) 0.0061
 Number of Grid Openings Scanned 7
 Asbestos Structure Size and Type Categories of Interest
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category
 5u Length
 <0.5u Diameter

Dust Generator
 Mass of Sample Tumbled(g) 60.3
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g) 0.00023

| | Total | Number of Protocol Structures |
|---------------------------------------|-------|-------------------------------|
| | | Long(>10um) |
| Asbestos Analysis Results | | |
| No. of Chrysotile Asbestos Structures | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 |
| Amphibole Mineral Type(s) | | |

ESTIMATED ASBESTOS CONCENTRATIONS (µgPM10)

| | Concentrations | |
|--|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 3.920E+07 | < 7.684E+07 |
| Long Chrysotile Protocol Structures | < 3.920E+07 | < 7.684E+07 |
| Total Amphibole Protocol Structures | < 3.920E+07 | < 7.684E+07 |
| Long Amphibole Protocol Structures | < 3.920E+07 | < 7.684E+07 |
| Long Asbestos Protocol Structures | < 3.920E+07 | < 7.684E+07 |
| Total Asbestos Protocol Structures | < 3.920E+07 | < 7.684E+07 |
| Estimated Analytical Sensitivity: (µgPM10) | 3.920E+07 | 7.684E+07 |

EMSL Analytical Inc.
 107 Haddon Avenue
 Westmont, NJ 08108
 Contacts: Stephen Siegel, CIH, Scott Slavin, Ph.D
 Phone: 856-858-4900 Fax: 856-858-4980

Report Date 9/28/2001
 Project Name 4-473322073-0619101-0001
 Methods Draft Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material Method (dated May 23, 2000, Revision 1)
 EMSL Order ID 040112849

Date Started 9/10/2001
 Date Completed 9/26/2001
 Analyst AS

Lab Sample# 040112849-0003
 Field Subsample# WR-003-VO
 Field Preparation Technique N/A
 Sample Drying Yes
 Sample Splitting N/A
 Other N/A

Test Analysis
 Effective Area of Analytical Filter (sq mm) 385 (ME)
 Magnification 19,000 X
 Grid Opening Area (sq mm) 0.0061
 Number of Grid Openings Scanned 4
 Asbestos Structure Size and Type Categories of Interest
 Protocol Fiber
 >5-10µ Length
 <0.5µ Diameter
 Amphiboles/Chrysotile
 Long Fiber
 >10µ Length
 <0.5µ Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category 5µ Length
 <0.5µ Diameter

Dust Generator
 Mass of Sample Tumbled(g) 60.38
 Air Flow Rate Through ME opening of Dust Generator (ml/min) 1430
 Air Flow Rate Through IST opening of Dust Generator (ml/min) 72
 Estimated Total Air Flow Rate Through Elutriator (ml/min) 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g) 0.000271

Asbestos Analysis Results

| | Total | Number of Protocol Structures Long(>10µm) |
|---------------------------------------|-------|--|
| No. of Chrysotile Asbestos Structures | 0 | 0 |
| No. of Amphibole Asbestos Structures | 0 | 0 |
| Amphibole Mineral Type(s) | | |

ESTIMATED ASBESTOS CONCENTRATIONS (s/gPM10)

| | Concentrations | |
|--|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 5.822E+07 | < 1.141E+08 |
| Long Chrysotile Protocol Structures | < 5.822E+07 | < 1.141E+08 |
| Total Amphibole Protocol Structures | < 5.822E+07 | < 1.141E+08 |
| Long Amphibole Protocol Structures | < 5.822E+07 | < 1.141E+08 |
| Long Asbestos Protocol Structures | < 5.822E+07 | < 1.141E+08 |
| Total Asbestos Protocol Structures | < 5.822E+07 | < 1.141E+08 |
| Estimated Analytical Sensitivity (s/gPM10) | 5.822E+07 | 1.141E+08 |

EMSL Analytical Inc.
 107 Haddon Avenue
 Westmont, NJ 08108
 Contacts: Stephen Siegel, CIH, Scott Slavin, Ph.D
 Phone: 856-858-4800 Fax: 856-858-4960

Report Date 9/28/2001
 Project Name 4-473322073-0819101-0001
 Methods Draft Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material Method (dated May 23, 2000, Revision 1)
 EMSL Order ID 040112848

Date Started
 Date Completed
 Analyst

9/10/2001
 9/26/2001
 AS

Lab Sample#
 Field Subsample#
 Field Preparation Technique
 Sample Drying
 Sample Splitting
 Other

040112849-0004
 WR-004-VO
 N/A
 Yes
 N/A
 N/A

Tem Analysis

Effective Area of Analytical Filter (sq mm)
 Magnification
 Grid Opening Area (sq mm)
 Number of Grid Openings Scanned
 Asbestos Structure Size and Type Categories of Interest

385 (ME)
 19,000 X
 0.0061
 10
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category

5u Length
 <0.5u Diameter

Dust Generator

Mass of Sample Tumbled(g)
 Air Flow Rate Through ME opening of Dust Generator (ml/min)
 Air Flow Rate Through IST opening of Dust Generator (ml/min)
 Estimated Total Air Flow Rate Through Elutriator (ml/min)

44.77
 1430
 72
 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g)

0.000183

Asbestos Analysis Results

No. of Chrysotile Asbestos Structures
 No. of Amphibole Asbestos Structures
 Amphibole Mineral Type(s)

Number of Protocol Structures

| Total | Long(>10um) |
|-------|-------------|
| 0 | 0 |
| 0 | 0 |

ESTIMATED ASBESTOS CONCENTRATIONS (µgPM10)

Total Chrysotile Protocol Structures
 Long Chrysotile Protocol Structures
 Total Amphibole Protocol Structures
 Long Amphibole Protocol Structures
 Long Asbestos Protocol Structures
 Total Asbestos Protocol Structures

| | Concentrations | |
|--------------------------------------|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 3.449E+07 | < 6.760E+07 |
| Long Chrysotile Protocol Structures | < 3.449E+07 | < 6.760E+07 |
| Total Amphibole Protocol Structures | < 3.449E+07 | < 6.760E+07 |
| Long Amphibole Protocol Structures | < 3.449E+07 | < 6.780E+07 |
| Long Asbestos Protocol Structures | < 3.449E+07 | < 6.780E+07 |
| Total Asbestos Protocol Structures | < 3.449E+07 | < 6.760E+07 |

Estimated Analytical Sensitivity: (µgPM10)

3.449E+07 6.760E+07

EMSL Analytical Inc.
 107 Haddon Avenue
 Westmont, NJ 08108
 Contacts: Stephen Siegel, CIH, Scott Slavin, Ph.D
 Phone:856-858-4800 Fax:856-858-4980

Report Date 9/28/2001
 Project Name 4-473322073-0619101-0001
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos in Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)
 EMSL Order ID 040112849

Date Started
 Date Completed
 Analyst

9/10/2001
 9/26/2001
 AS

Lab Sample#
 Field Subsample#
 Field Preparation Technique
 Sample Drying
 Sample Splitting
 Other

040112849-0006
 WR-008-VO
 N/A
 Yes
 N/A
 N/A

TEM Analysis
 Effective Area of Analytical Filter (sq mm)
 Magnification
 Grid Opening Area (sq mm)
 Number of Grid Openings Scanned
 Asbestos Structure Size and Type Categories of Interest

385 (ME)
 19,000 X
 0.0081
 10
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile
 Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category

5u Length
 <0.5u Diameter

Dust Generator
 Mass of Sample Tumbled(g)
 Air Flow Rate Through ME opening of Dust Generator (ml/min)
 Air Flow Rate Through IST opening of Dust Generator (ml/min)
 Estimated Total Air Flow Rate Through Elutriator (ml/min)

48.5
 1430
 72
 1502

Filters from the Isokinetic Sampling Tube(IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g)

0.000215

Asbestos Analysis Results
 No. of Chrysotile Asbestos Structures
 No. of Amphibole Asbestos Structures
 Amphibole Mineral Type(s)

| Total | Number of Protocol Structures | |
|-------|-------------------------------|---|
| | Long(>10um) | |
| 0 | 0 | 0 |
| 0 | 0 | 0 |

ESTIMATED ASBESTOS CONCENTRATIONS (sgPM10)

| | Concentrations | |
|--|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 2.936E+07 | < 5.754E+07 |
| Long Chrysotile Protocol Structures | < 2.936E+07 | < 5.754E+07 |
| Total Amphibole Protocol Structures | < 2.936E+07 | < 5.754E+07 |
| Long Amphibole Protocol Structures | < 2.936E+07 | < 5.754E+07 |
| Long Asbestos Protocol Structures | < 2.936E+07 | < 5.754E+07 |
| Total Asbestos Protocol Structures | < 2.936E+07 | < 5.754E+07 |
| Estimated Analytical Sensitivity: (sgPM10) | 2.936E+07 | 5.754E+07 |

EMSL Analytical Inc.
 107 Haddon Avenue
 Westmont, NJ 08108
 Contacts: Stephen Siegel, CIH, Scott Slavin, Ph.D
 Phone: 856-858-4800 Fax: 856-858-4880

Report Date 9/28/01
 Project Name 4-473322073-0618101-0001
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos in Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)
 EMSL Order ID 040112849

Date Started
 Date Completed
 Analyst

9/10/01
 9/26/01
 AS

Lab Sample#
 Field Subsample#
 Field Preparation Technique
 Sample Drying
 Sample Splitting
 Other

040112849-0007
 WR-007-SSQC
 N/A
 Yes
 N/A
 N/A

TEM Analysis
 Effective Area of Analytical Filter (sq mm)
 Magnification
 Grid Opening Area (sq mm)
 Number of Grid Openings Scanned
 Asbestos Structure Size and Type Categories of Interest

385 (ME)
 19,000 X
 0.0061
 10
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category

Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile
 5u Length
 <0.5u Diameter

Dust Generator
 Mass of Sample Tumbled(g)
 Air Flow Rate Through ME opening of Dust Generator (ml/min)
 Air Flow Rate Through IST opening of Dust Generator (ml/min)
 Estimated Total Air Flow Rate Through Elutriator (ml/min)

58.45
 1430
 72
 1502

Filters from the Isokinetic Sampling Tube (IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g)

0.00014

Asbestos Analysis Results
 No. of Chrysotile Asbestos Structures
 No. of Amphibole Asbestos Structures
 Amphibole Mineral Type(s)

| Total | Number of Protocol Structures | |
|-------|-------------------------------|---|
| | Long(>10um) | |
| 0 | 0 | 0 |
| 0 | 0 | 0 |

ESTIMATED ASBESTOS CONCENTRATIONS (a/gPM10)

| | Concentrations | |
|---|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 4.508E+07 | < 8.836E+07 |
| Long Chrysotile Protocol Structures | < 4.508E+07 | < 8.836E+07 |
| Total Amphibole Protocol Structures | < 4.508E+07 | < 8.838E+07 |
| Long Amphibole Protocol Structures | < 4.508E+07 | < 8.838E+07 |
| Long Asbestos Protocol Structures | < 4.508E+07 | < 8.836E+07 |
| Total Asbestos Protocol Structures | < 4.508E+07 | < 8.838E+07 |
| Estimated Analytical Sensitivity: (a/gPM10) | 4.508E-07 | 8.838E-07 |

EMSL Analytical Inc.
 107 Haddon Avenue
 Westmont, NJ 08108
 Contact: Stephen Siegel, CIH, Scott Slavin, Ph.D
 Phone: 856-858-4800 Fax: 856-858-4980

Report Date 9/28/01
 Project Name 4-473322073-0819101-0001
 Methods Draft Modified Elutriator Method for the Determination
 of Asbestos in Soils and Bulk Material Method
 (dated May 23, 2000, Revision 1)
 EMSL Order ID 040112849

Date Started
 Date Completed
 Analyst

9/10/01
 9/26/01
 AS

Lab Sample#
 Field Subsample#
 Field Preparation Technique
 Sample Drying
 Sample Splitting
 Other

040112849-0007
 WR-007-SS
 N/A
 Yes
 N/A
 N/A

TEM Analysis
 Effective Area of Analytical Filter (sq mm)
 Magnification
 Grid Opening Area (sq mm)
 Number of Grid Openings Scanned
 Asbestos Structure Size and Type Categories of Interest

385 (ME)
 18,000 X
 0.0061
 10
 Protocol Fiber
 >5-10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Long Fiber
 >10u Length
 <0.5u Diameter
 Amphiboles/Chrysotile

Minimum Acceptable Structure Identification Category

5u Length
 <0.5u Diameter

Dust Generator
 Mass of Sample Tumbled(g)
 Air Flow Rate Through ME opening of Dust Generator (ml/min)
 Air Flow Rate Through IST opening of Dust Generator (ml/min)
 Estimated Total Air Flow Rate Through Elutriator (ml/min)

58.45
 1430
 72
 1502

Filters from the Isokinetic Sampling Tube (IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g)

0.000173

Asbestos Analysis Results
 No. of Chrysotile Asbestos Structures
 No. of Amphibole Asbestos Structures
 Amphibole Mineral Type(s)

| Total | Number of Protocol Structures | |
|-------|-------------------------------|--------------|
| | | Long (>10um) |
| 0 | | 0 |
| 0 | | 0 |

ESTIMATED ASBESTOS CONCENTRATIONS (µgPM10)

| | Concentrations | |
|--|----------------|-------------|
| | Mean | 95% UCL |
| Total Chrysotile Protocol Structures | < 3.848E+07 | < 7.151E+07 |
| Long Chrysotile Protocol Structures | < 3.848E+07 | < 7.151E+07 |
| Total Amphibole Protocol Structures | < 3.848E+07 | < 7.151E+07 |
| Long Amphibole Protocol Structures | < 3.848E+07 | < 7.151E+07 |
| Long Asbestos Protocol Structures | < 3.848E+07 | < 7.151E+07 |
| Total Asbestos Protocol Structures | < 3.848E+07 | < 7.151E+07 |
| Estimated Analytical Sensitivity: (µgPM10) | 3.848E+07 | 7.151E+07 |

EMSL Analytical Inc.
 107 Haddon Avenue
 Westmont, NJ 08108
 Contacts: Stephen Siegel, CIH, Scott Slavin, Ph.D
 Phone: 856-858-4800 Fax: 856-858-4960

Date Started
 Date Completed
 Analyst

Lab Sample#
 Field Subsample#
 Field Preparation Technique
 Sample Drying
 Sample Splitting
 Other

TEM Analysis
 Effective Area of Analytical Filter (sq mm)
 Magnification
 Grid Opening Area (sq mm)
 Number of Grid Openings Scanned
 Asbestos Structure Size and Type Categories of Interest

Minimum Acceptable Structure Identification Category

Dust Generator
 Mass of Sample Tumbled(g)
 Air Flow Rate Through ME opening of Dust Generator (m³/min)
 Air Flow Rate Through IST opening of Dust Generator (m³/min)
 Estimated Total Air Flow Rate Through Elutriator (m³/min)

Filters from the Isokinetic Sampling Tube (IST) opening of the Elutriator
 Mass of Respirable Dust on Filter(g)

Asbestos Analysis Results
 No. of Chrysotile Asbestos Structures
 No. of Amphibole Asbestos Structures
 Amphibole Mineral Type(s)

Report Date 9/28/2001
 Project Name 4-473322073-0819101-0001
 Methods Draft Modified Elutriator Method for the Determination of Asbestos in Soils and Bulk Material Method (dated May 23, 2000, Revision 1)
 EMSL Order ID 040112849

9/10/2001
 9/26/2001
 AS

LAB BLANK
 N/A
 N/A
 Yes
 N/A
 N/A

385 (ME)
 19,000 X
 0.0061
 10
 Protocol Fiber
 > 6-10u Length
 < 0.5u Diameter
 Amphiboles/Chrysotile

Long Fiber
 > 10u Length
 < 0.5u Diameter
 Amphiboles/Chrysotile

5u Length
 < 0.5u Diameter

1430
 72
 1502

| <u>Total</u> | <u>Number of Protocol Structures</u> | |
|--------------|--------------------------------------|------------------------|
| | | <u>Long (>10um)</u> |
| 0 | | 0 |
| 0 | | 0 |

QC Blank

USEPA REGION 8 LIBBY SITE INVESTIGATION
TEM Asbestos Structure Count

| | |
|--|--------------------|
| Laboratory name: | EMSL, Westmont, NJ |
| Instrument | JEOL 100 CX II (2) |
| Voltage | 100 KV |
| Magnification | 19000 X |
| Grid opening area (mm ²) | 0.0061 |
| Scale: 1L = | 1 |
| Scale: 1D = | 1 |
| Primary filter area (mm ²) | 385 |
| Secondary Filter Area (mm ²) | |

| | |
|--|------------|
| EPA Sample Number: | QC Blank |
| Sample Type (A=Air, D=Dust, O=Other): | |
| Air volume (L) or dust area (cm ²) | |
| Date received by lab | |
| Lab Job Number: | 090112.849 |
| Lab Sample Number: | |
| Number of grids prepared | 4 |
| Prepared by | BF |
| Preparation date | |

| | |
|---|-----------|
| Analyzed by | AUS |
| Analysis date | 9-27-2001 |
| Method (D=Direct, I=Indirect) | D |
| Counting rules (I=ISO10312, A=AHERA, O=Other) | I |
| Grid storage location | 2001-C |

| | |
|---|--|
| Secondary Prep | |
| Fraction of primary filter used: | |
| Total resuspension volume (mL) | |
| Volume filtered for secondary prep (mL) | |

Row M

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class (see below) | | | | Sketch/Comments | 1 = yes, blank = no | | | |
|------|--------------|----------------|-------------------|-------|------------|-------|----------------|---------------------------|----|---|----|-----------------|---------------------|-------|-----|--|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | |
| 1 | G-8 | ND | | | | | | | | | | | | | | |
| | E-4 | | | | | | | | | | | | | | | |
| | L-5 | | | | | | | | | | | | | | | |
| | M-11 | | | | | | | | | | | | | | | |
| | F-12 | | | | | | | | | | | | | | | |
| 2 | K-7 | | | | | | | | | | | | | | | |
| | H-8 | | | | | | | | | | | | | | | |
| | E-12 | | | | | | | | | | | | | | | |
| | C-9 | | | | | | | | | | | | | | | |
| | D-4 | ✓ | | | | | | | | | | | | | | |

COPY

Row M

LA = Libby-type amphibole

OA = Other (non-Libby type) amphibole

C = Chrysotile

NA = Non-asbestos

Attn: Jim Gray
 U.S. EPA
 Environmental Services Division
 College Station Rd
 Athens, GA 30613-7799

ELUTRIATOR

Fax: 7063558744

Phone: 706-355-8613

USEPA REGION 8 SITE INVESTIGATION
 TEM Asbestos Structure Count

| | |
|--|--------------------|
| Laboratory name: | EMSL, Westmont, NJ |
| Instrument | JEOL 100 CX II (2) |
| Voltage | 100 KV |
| Magnification | 19000 X |
| Grid opening area (mm ²) | 0.0061 |
| Scale: 1L = | 1 |
| Scale: 1D = | 1 |
| Primary filter area (mm ²) | 385 |
| Secondary Filter Area (mm ²) | |

| | |
|--|-----------|
| EPA Sample Number: | WR-001-VO |
| Sample Type (A=Air, D=Dust, O=Other): | D |
| Air volume (L) or dust area (cm ²) | |
| Date received by lab | 8-7-2001 |
| Lab Job Number: | 040112849 |
| Lab Sample Number: | 0001 |
| Number of grids prepared | 4 |
| Prepared by | DS |
| Preparation date | 9-10-2001 |

| | |
|---|-----------|
| Analyzed by | MS |
| Analysis date | 9-18-2001 |
| Method (D=Direct, I=Indirect) | |
| Counting rules (I=ISO10312, A=AHERA, O=Other) | I |
| Grid storage location | 2001-C |

Secondary Prep

| | |
|---|--|
| Fraction of primary filter used: | |
| Total resuspension volume (mL) | |
| Volume filtered for secondary prep (mL) | |

Row J

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class (see below) | | | | Sketch/Comments | 1 = yes, blank = no | | | |
|------|--------------|----------------|-------------------|-------|------------|-------------|----------------|---------------------------|----|---|----|-----------------|---------------------|-------|-----|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | |
| 1 | G-8 | MDII MF | | | 7.5 7.5 | 0.4 0.3 | | LA | | | | | | | | 1 |
| | J-4 | ND | | | | | | | | | | | | | | |
| | L-8 | MDII MF | | | 8 8.0 | 1.5 0.65 | | LA | | | | | | | | 1 |
| | F | F | | | 3.2 | 0.25 | | LA | | | | | | | | 1 |
| | | MDII MF | | | 8 8.0 | 1.2 0.5 | | LA | | | | | | | | 1 |
| | M-13 | MDII MF | | | 7.5 5.0 | 5 0.6 | | LA | | | | | | | | 1 |
| | | F | | | 5.0 | 1.1 | | LA | | | | | | | | 1 |
| | | MDII MF | | | 30 28.5 | 5 0.5 | | LA | | | | | | | | 1 |
| | I-13 | ND | | | | | | | | | | | | | | |
| 2 | H-6 | | | | | | | | | | | | | | | |

COPY

LA = Libby-type amphibole

OA = Other (non-Libby type) amphibole

C = Chrysotile

USEPA REGION 8 LIBBY SITE INVESTIGATION
TEM Asbestos Structure Count

LAB NAME: EMSL, Westmont, NJ
LAB SAMPLE NO: 0001

EPA SAMPLE NO: WR-001-V01 75 Min
SAMPLE TYPE: D

LAB JOB NUMBER: 040112849
GRID STORAGE LOC: 2001-C

Row J

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class | | | | Sketch/Comments | 1 = yes, blank = no | | | | | | | |
|------|--------------|----------------|-------------------|-------|------------|-------|----------------|---------------|----|---|----|-----------------|---------------------|-------|-----|--|--|--|--|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | | | | | |
| 2 | D-10 | MD10 | | | 11.5 | 6 | | | | | | | | | | | | | | |
| | | MF | | | 3.2 | 0.7 | LA | | | | | | | | | | | | | 1 |
| | | F | | | 2.8 | 0.9 | | LA | | | | | | | | | | | | 1 |
| C-6 | | MD10 | | | 10 | 2.5 | | | | | | | | | | | | | | |
| | | MF | | | 6 | 0.9 | LA | | | | | | | | | | | | | 1 |
| | | MD11 | | | 5.4 | 1.2 | | | | | | | | | | | | | | |
| | | MF | | | 5.1 | 0.9 | LA | | | | | | | | | | | | | |
| G-5 | | ND | | | | | | | | | | | | | | | | | | |
| L-7 | | MD10 | | | 10 | 8 | | | | | | | | | | | | | | |
| | | MF | | | 2.2 | 0.8 | LA | | | | | | | | | | | | | |

COPY

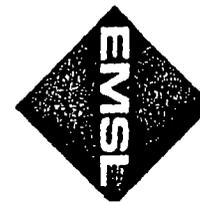
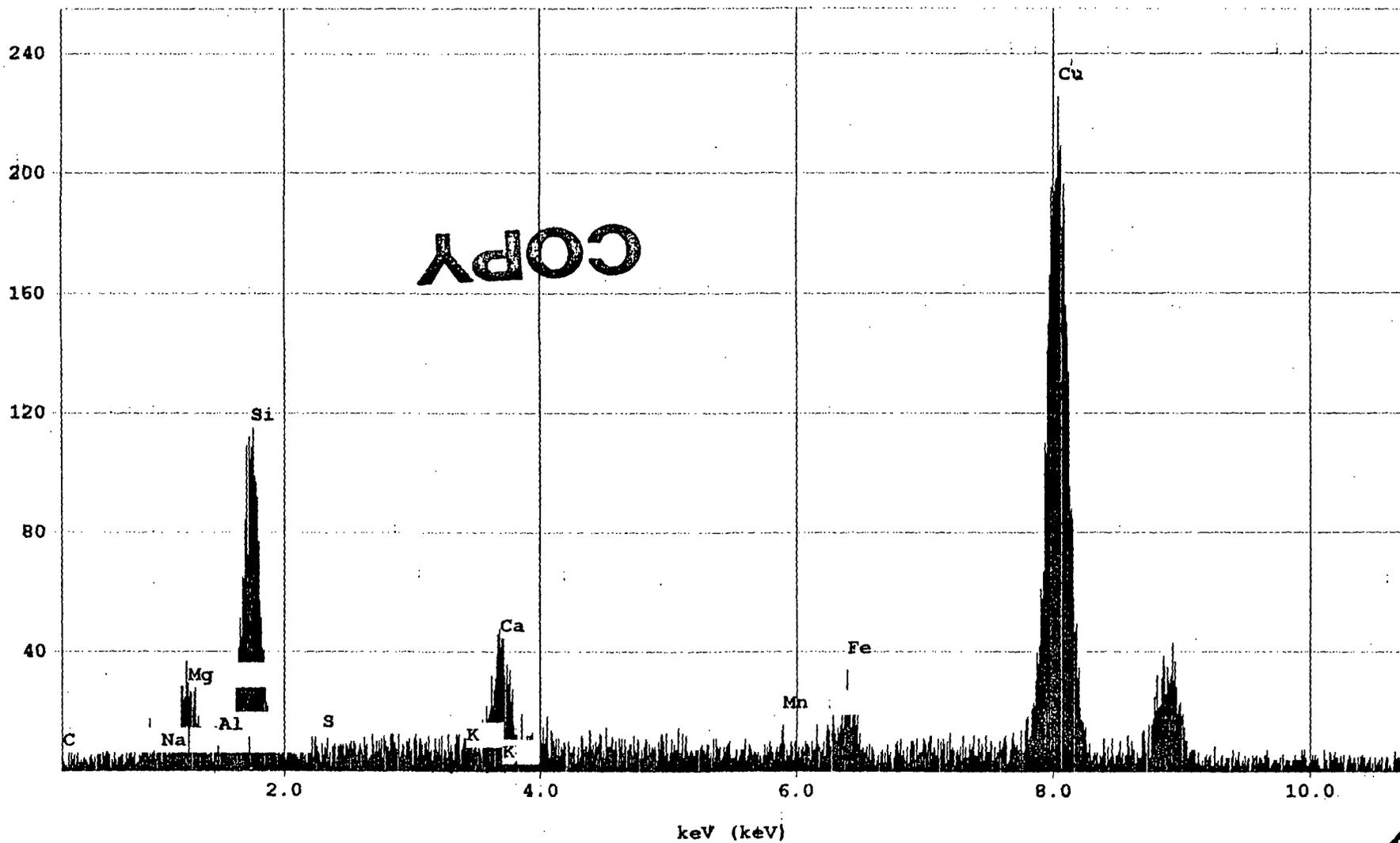
Row J

EMSL Analytical, Westmont, NJ

QDM_112849_WR-001-YO : Libby Amphibole

Wednesday, September 12, 2001

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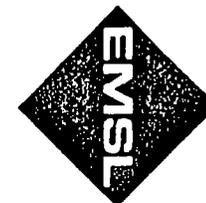
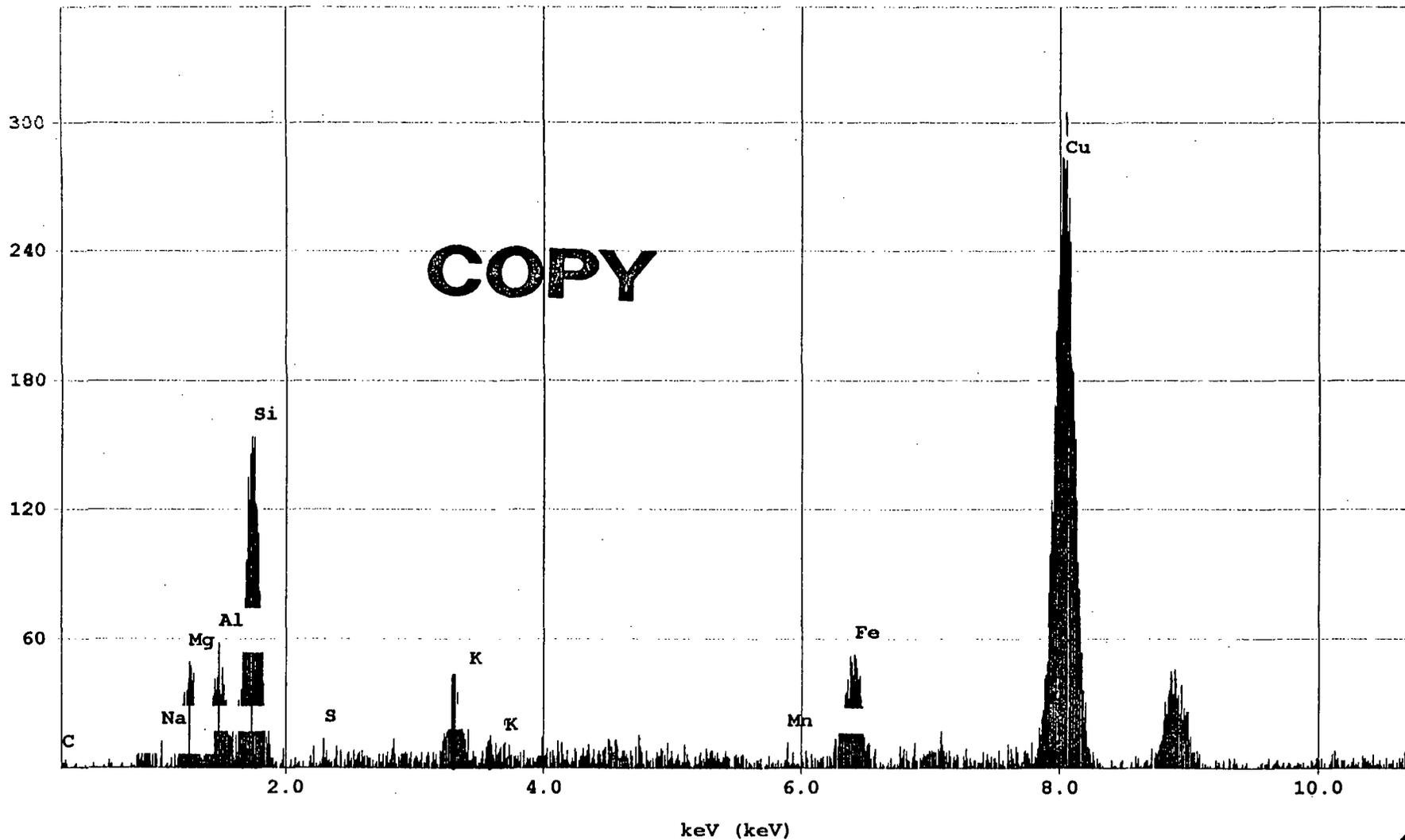


EMSL Analytical, Westmont, NJ

CDM_112849_WR-001-VO : Libby Amphibole

Wednesday, September 12, 2001

ID(1):

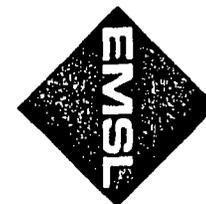
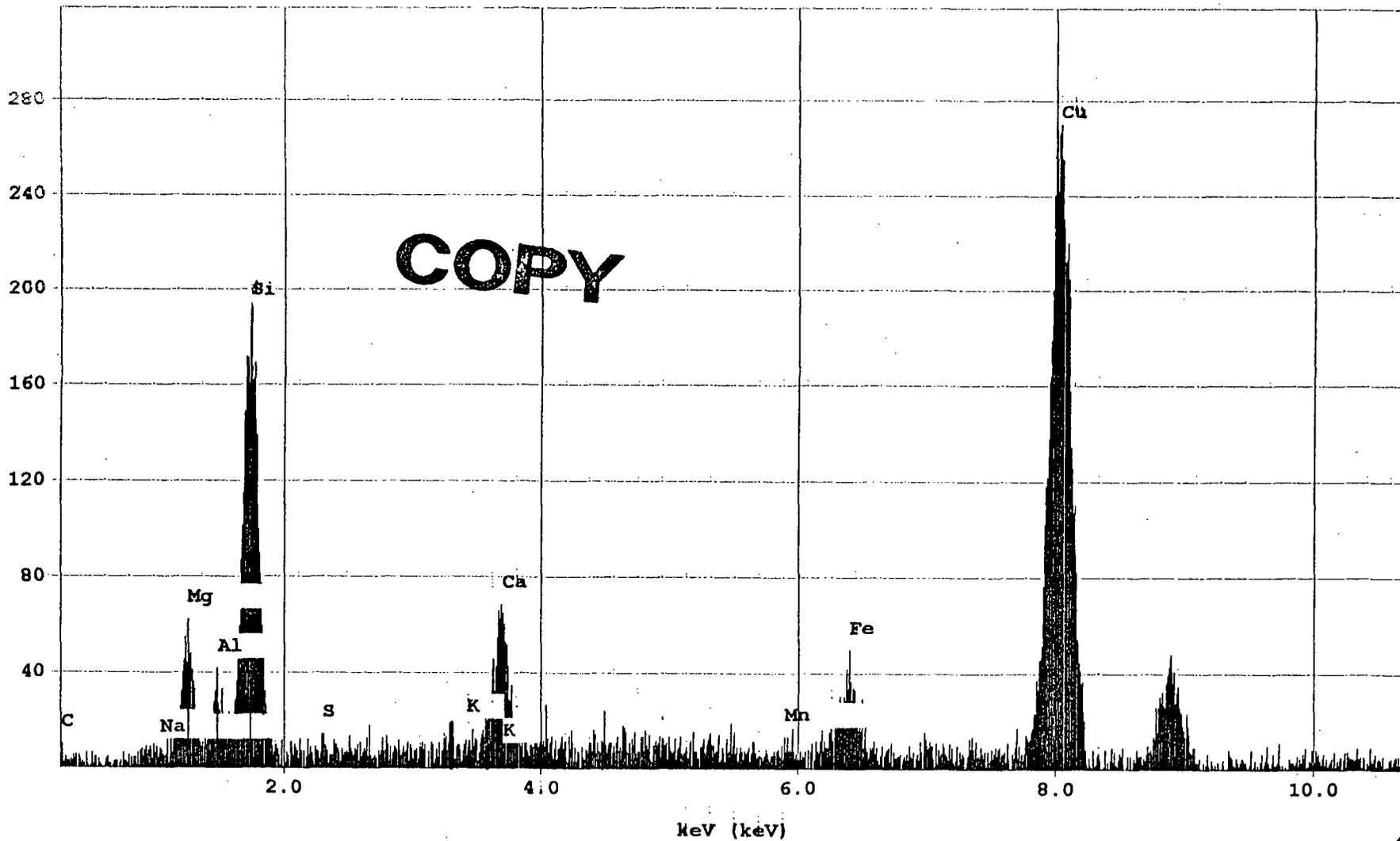


EMSL Analytical, Westmont, NJ

CDM_112849_WR-001-VO : Libby Amphibole

Wednesday, September 12, 2001

ID(1):

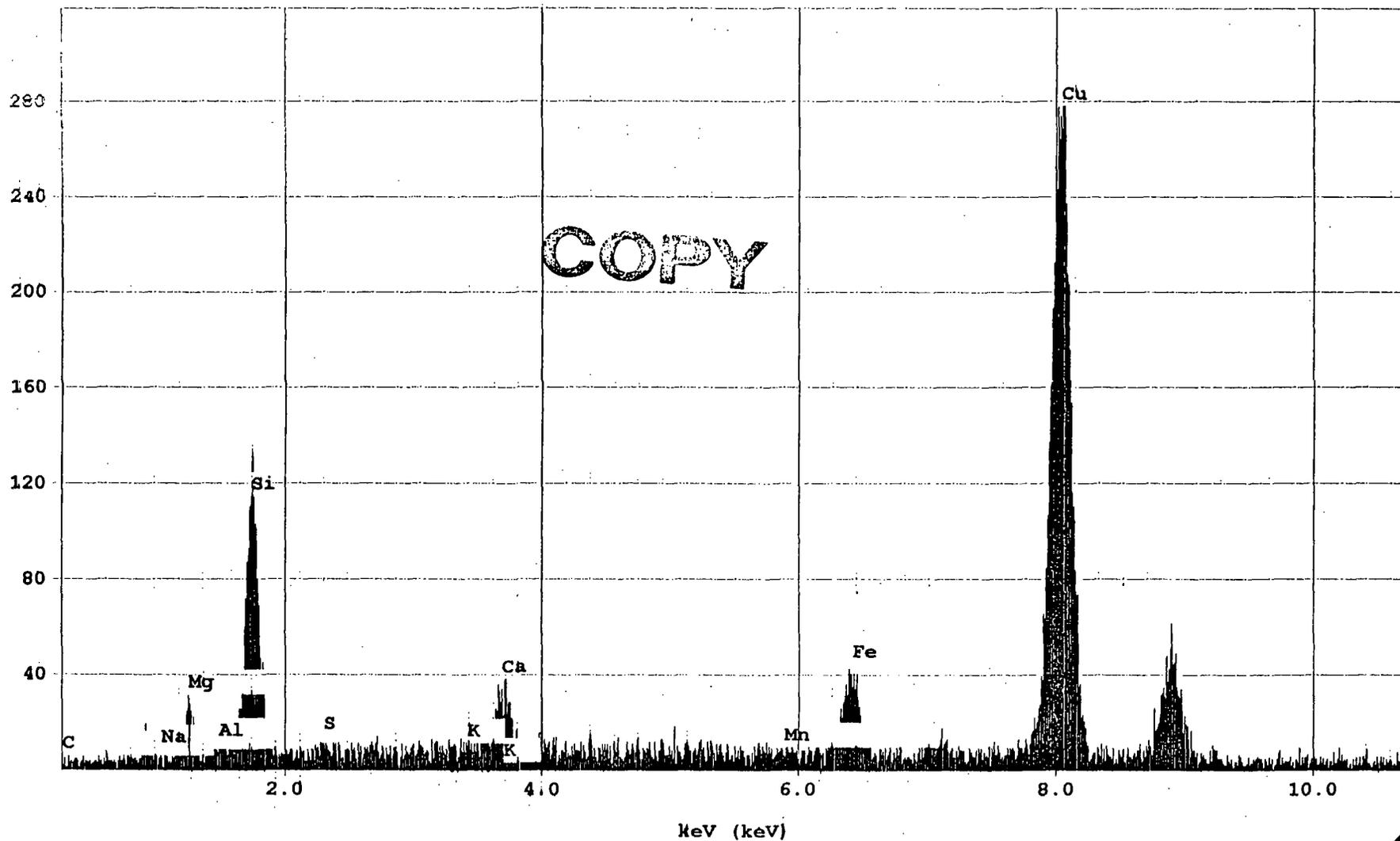


EMSL Analytical, Westmont, NJ

CDM 112849 WR-001-VO : Libby Amphibole

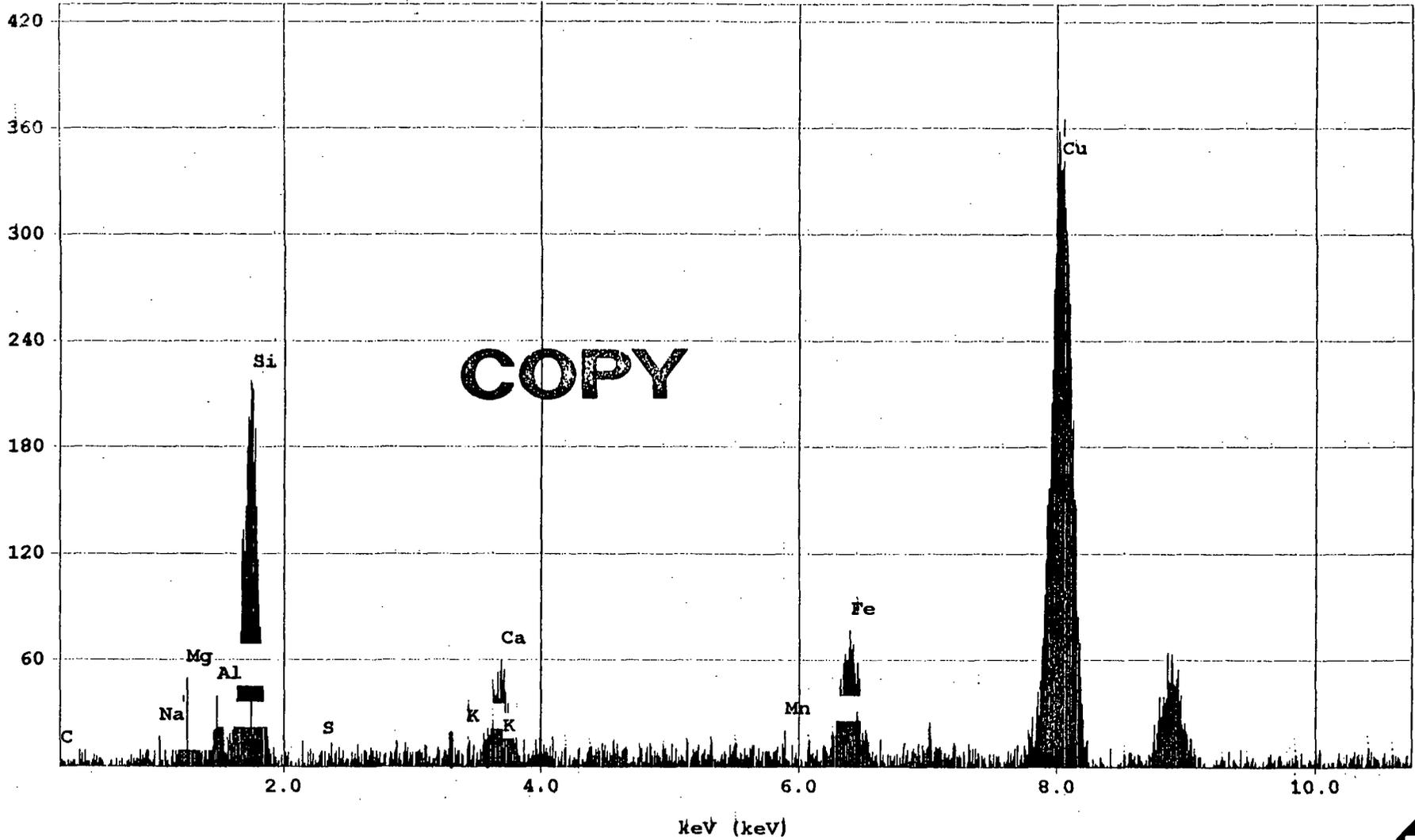
Wednesday, September 12, 2001

ID(1):



EMSL Analytical, Westmont, NJ
CDM_112849_WR-001-VO : Libby Amphibole
Wednesday, September 12, 2001

ID(1):

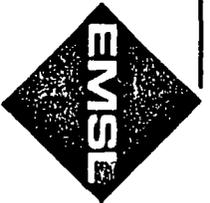
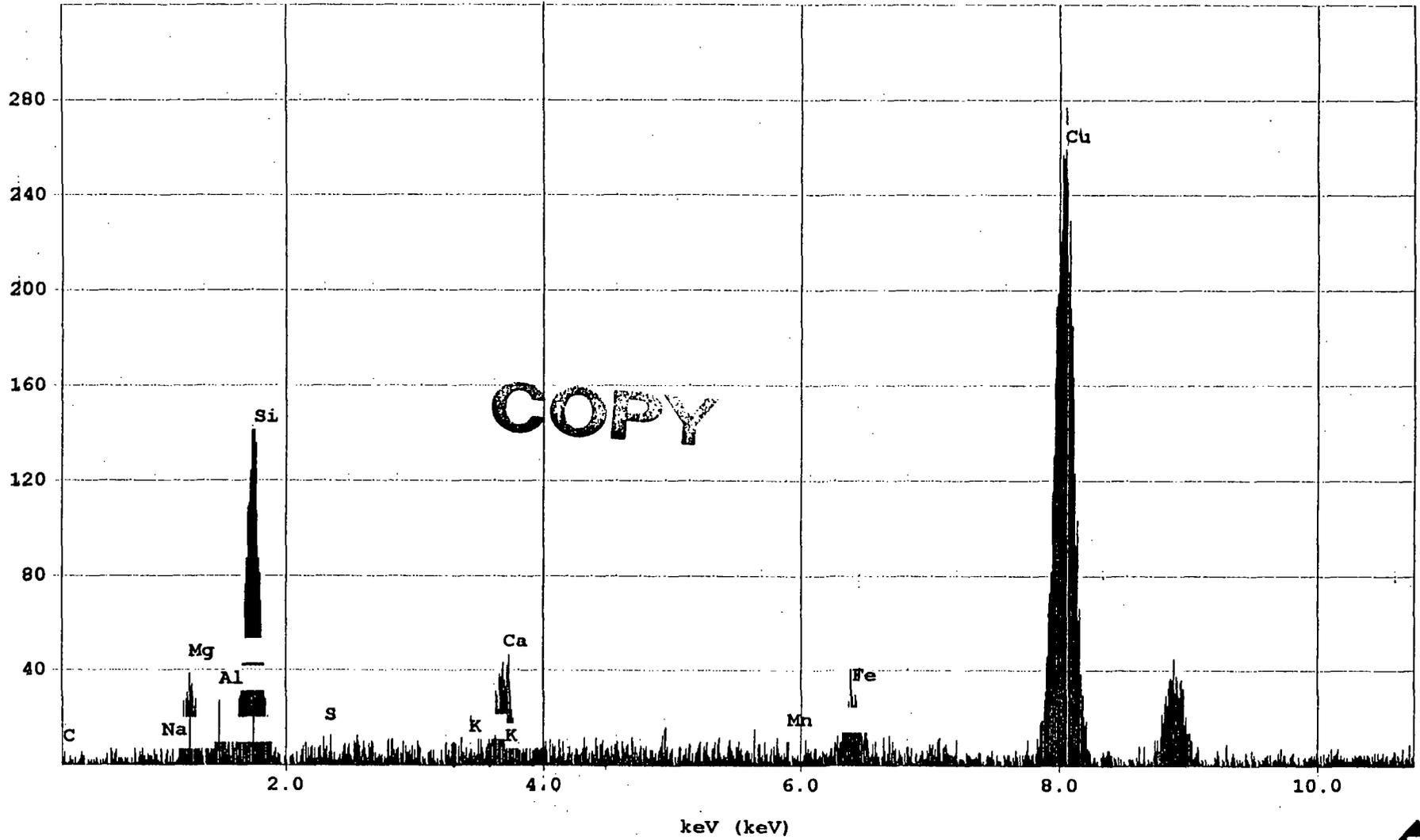


EMSL Analytical, Westmont, NJ

CDM_112849_WR-001-VO : Libby Amphibole

Wednesday, September 12, 2001

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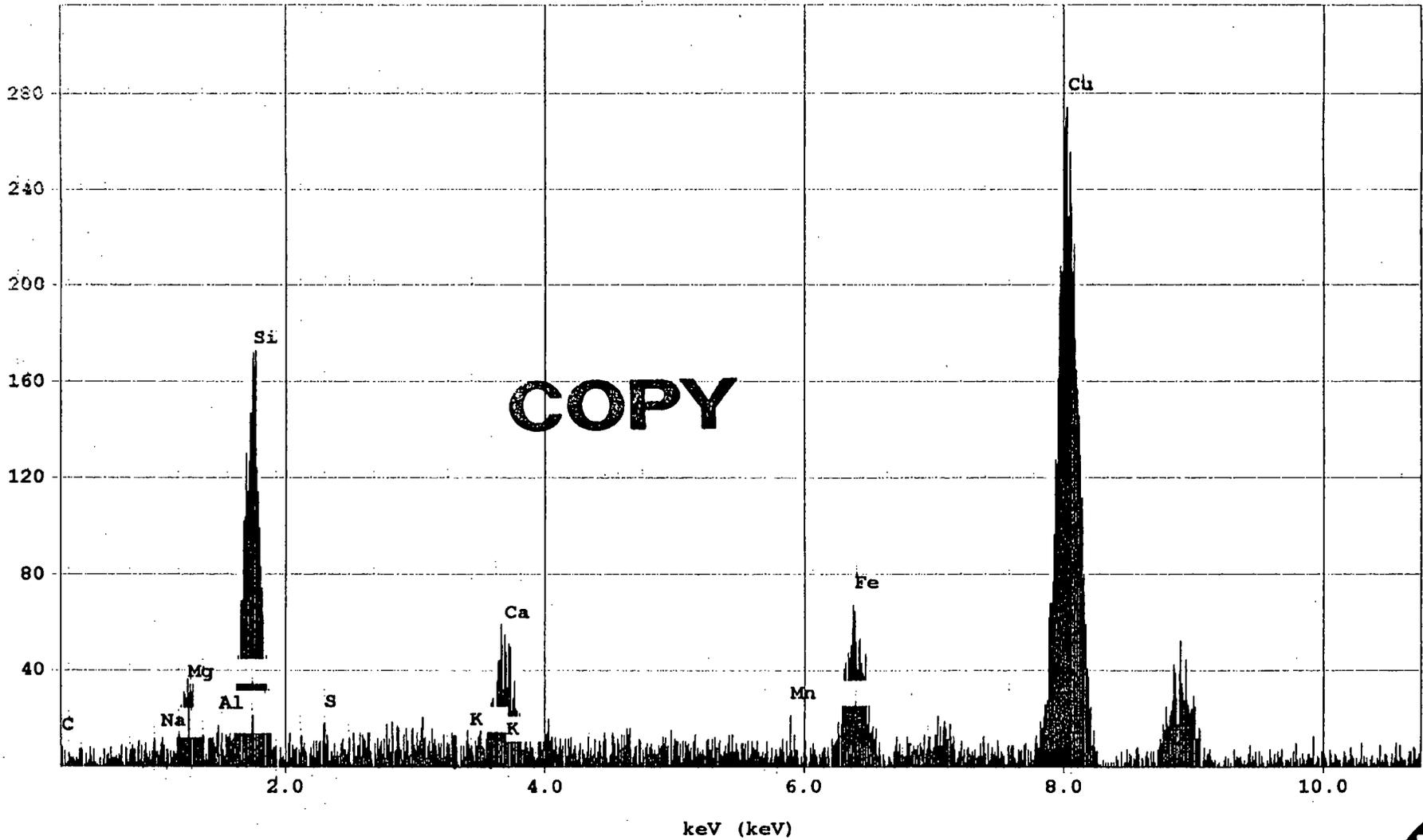


EMSL Analytical, Westmont, NJ

CDM 112849 WR-001-VO : Libby Amphibole

Wednesday, September 12, 2001

ID(1):

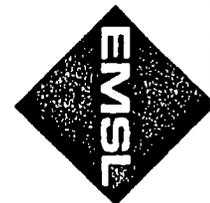
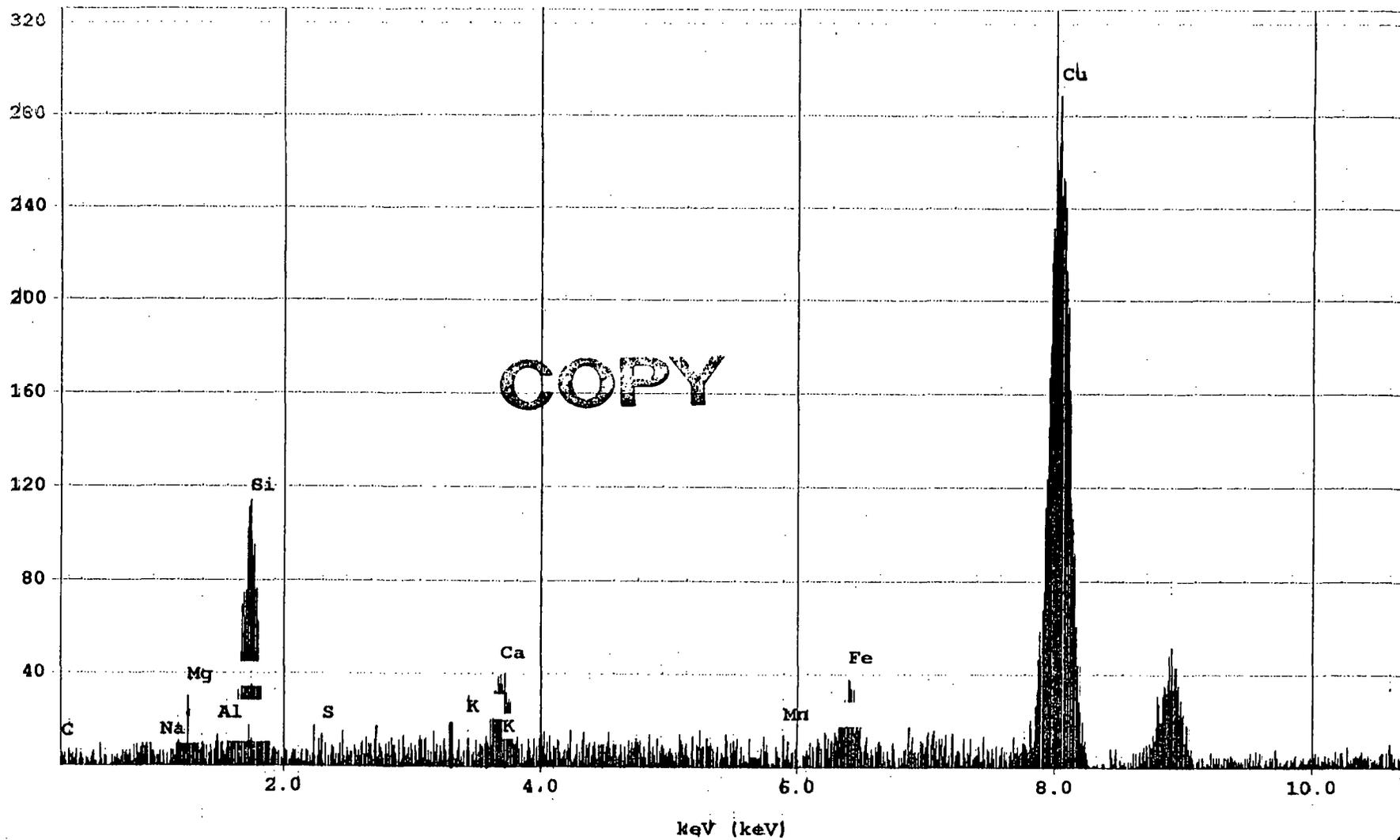


EMSL Analytical, Westmont, NJ

CDM 112849 WR-001-VO : Libby Amphibole

Wednesday, September 12, 2001

ID(1):



Attn: Jim Gray
 U.S. EPA
 Environmental Services Division
 College Station Rd
 Athens, GA 30613-7799

Fax: 7063558744

Phone: 706-355-8613

ELUTRIATOR

USEPA REGION 8 SITE INVESTIGATION
 TEM Asbestos Structure Count

| | |
|--|--------------------|
| Laboratory name: | EMSL, Westmont, NJ |
| Instrument | JEOL 100 CX II (2) |
| Voltage | 100 KV |
| Magnification | 19000 X |
| Grid opening area (mm ²) | 0.0061 |
| Scale: 1L = | 1 |
| Scale: 1D = | 1 |
| Primary filter area (mm ²) | 385 |
| Secondary Filter Area (mm ²) | |

| | |
|--|-----------|
| EPA Sample Number: | WR-002-VO |
| Sample Type (A=Air, D=Dust, O=Other): | D |
| Air volume (L) or dust area (cm ²) | |
| Date received by lab | 8-7-2001 |
| Lab Job Number: | 040112849 |
| Lab Sample Number: | 0002 |
| Number of grids prepared | 4 |
| Prepared by | DS |
| Preparation date | 9-10-2001 |

| | |
|--|-----------|
| Analyzed by | JWS |
| Analysis date | 9-13-2001 |
| Method (D=Direct, I=Indirect) | D |
| Counting rules (I=ISO10312, A=ASHERA, O=Other) | I |
| Grid storage location | 2001 - C |

Secondary Prep

| | |
|---|--|
| Fraction of primary filter used: | |
| Total resuspension volume (mL) | |
| Volume filtered for secondary prep (mL) | |

Row K

Row K

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class (see below) | | | | Sketch/Comments | 1 = yes, blank = no | | | |
|------|--------------|----------------|-------------------|-------|------------|-------|----------------|---------------------------|----|---|----|-----------------|---------------------|-------|-----|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | |
| 1 | F-8 | F | | | 6.0 | 0.2 | | LA | | | | | | | | 1 |
| | | MD10 MF | | | 10 | 8 | | LA | | | | | | | | 1 |
| | I-4 | MD11 MF | | | 6.0 | 1.2 | | LA | | | | | | | | 1 |
| | | | | | 15 | 5.5 | | | | | | | | | | 1 |
| | | | | | 14 | 2.2 | | | | | NA | Al, Si, Fe | | | | 1 |
| | | MD14 MF | | | 10 | 7 | | LA | | | | | | | | 1 |
| | | F | | | 2.3 | 0.2 | | LA | | | | | | | | 1 |
| | L-5 | F | | | 4.7 | 0.5 | | LA | | | | | | | | 1 |
| | | F | | | 6.6 | 0.5 | | LA | | | | | | | | 1 |
| | | | | | 20 | 5.5 | | | | | | | | | | 1 |
| | | | | | 170 | 2 | | | | | NA | Al, Si, Fe | | | | 1 |
| | | MD10 MF | | | 7 | 5 | | LA | | | | | | | | 1 |
| | | | | | 3.2 | 0.9 | | | | | | | | | | 1 |

COPY

LA = Libby-type amphibole

OA = Other (non-Libby type) amphibole

C = Chrysotile

E Lutriator

USEPA REGION 8 LIBBY SITE INVESTIGATION
TEM Asbestos Structure Count

LAB NAME: EMSL, Westmont, NJ
LAB SAMPLE NO: 0002

EPA SAMPLE NO: WR-002-V0 10 min
SAMPLE TYPE: D

LAB JOB NUMBER: 040112849
GRID STORAGE LOC: 2001-C Row K

Row K

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class | | | | Sketch/Comments | 1 = yes, blank = no | | | |
|------|--------------|----------------|-------------------|---------|------------|-------|----------------|---------------|----|----|----|-----------------|---------------------|-------|-----|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | |
| 1 | D-4 | F | | | 7.5 | 1.5 | | LA | | | | | | | 1 | |
| | | MD11 MF | | | 9 | 2.2 | | | | | | | | | 1 | |
| | | MD11 MF | | | 20 | 10.0 | | | | | | | | | 1 | |
| | | MD11 MF | | | 13.0 | 1.0 | | LA | | | | | | | 1 | |
| 2 | E-10 | | | | 11 | 1.1 | | LA | | | | | | | 1 | |
| | | | | | 11 | 0.4 | | | | | | | | | 1 | |
| | | | | | 19 | 8 | | | | | NA | Ti only | | | 1 | |
| | | | | | 7.3 | 0.6 | | | | | | | | | 1 | |
| | | | | MD11 MF | | | 13 | 8 | | | | | | | | 1 |
| | | | | MD10 MF | | | 7.5 | 0.5 | | LA | | | | | | 1 |
| | | | | MD10 MF | | | 12 | 10 | | | | | | | | 1 |
| | | | | MD2 MF | | | 3.5 | 0.7 | | LA | | | | | | 1 |
| | | | | | 10.5 | 9 | | | | | | | | 1 | | |
| | | | | | 5 | 0.3 | | LA | | | | | | 1 | | |
| | | MF | | | 7 | 0.75 | | LA | | | | | | 1 | | |
| | | MD11 MF | | | 12 | 2 | | | | | | | | 1 | | |
| | | | | | 8 | 2 | | LA | | | | | | 1 | | |
| | I-12 | ND | | | | | | | | | | | | | | |
| | L-9 | F | | | 4.2 | 0.7 | | LA | | | | | | | 1 | |
| | | MD11 MF | | | 7 | 7 | | | | | | | | | 1 | |
| | | MD11 MF | | | 5 | 0.3 | | LA | | | | | | | 1 | |
| | | MD11 MF | | | 7.5 | 1.1 | | | | | | | | | 1 | |
| | | | | | 5 | 0.4 | | LA | | | | | | | 1 | |
| | | F | | | 4 | 0.2 | | LA | | | | | | | 1 | |

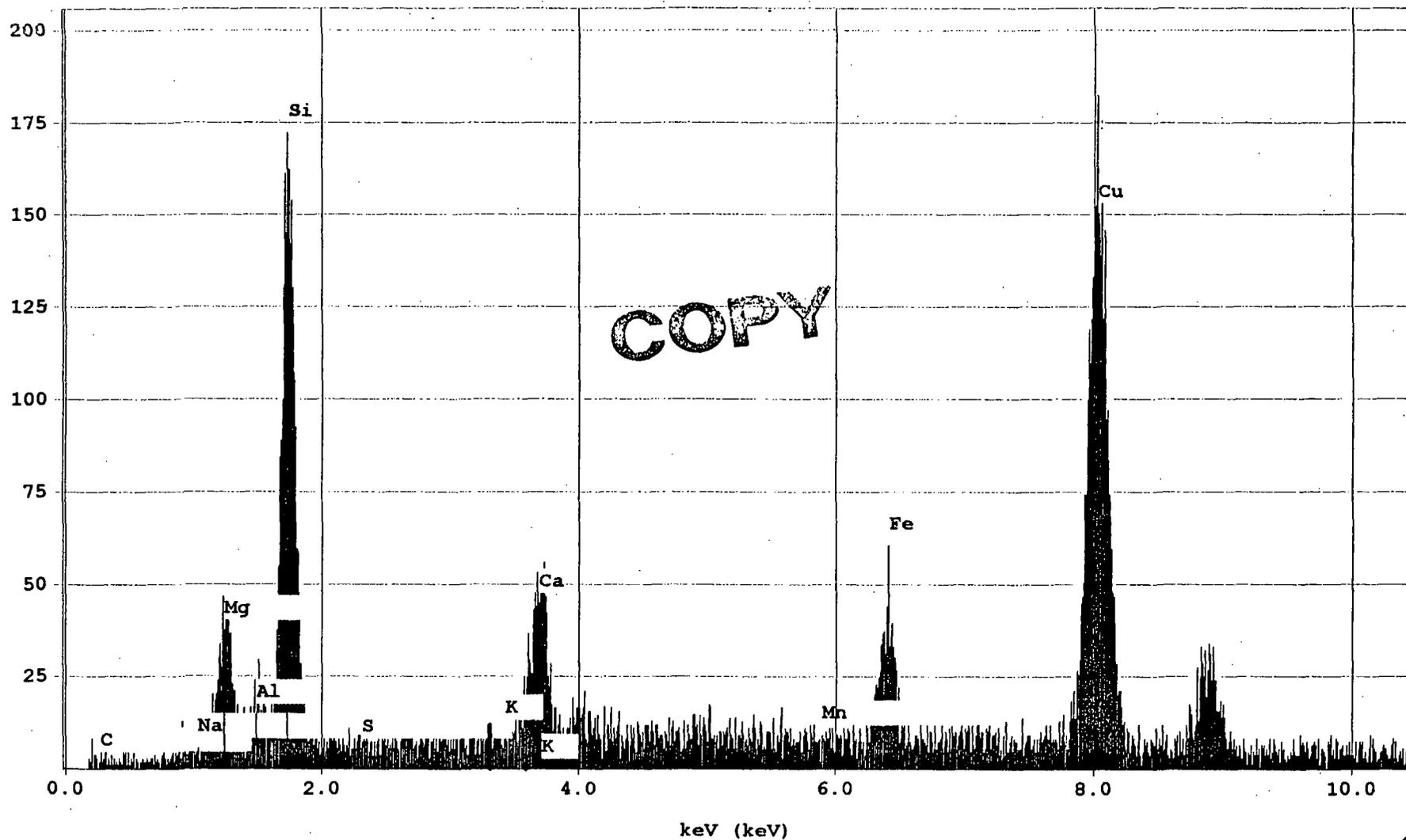
COPY

EMSL Analytical, Westmont, NJ

EPA_112849_WR-002-VO : Libby Amphibole

Thursday, September 13, 2001

EDS:

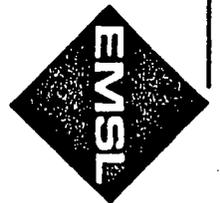
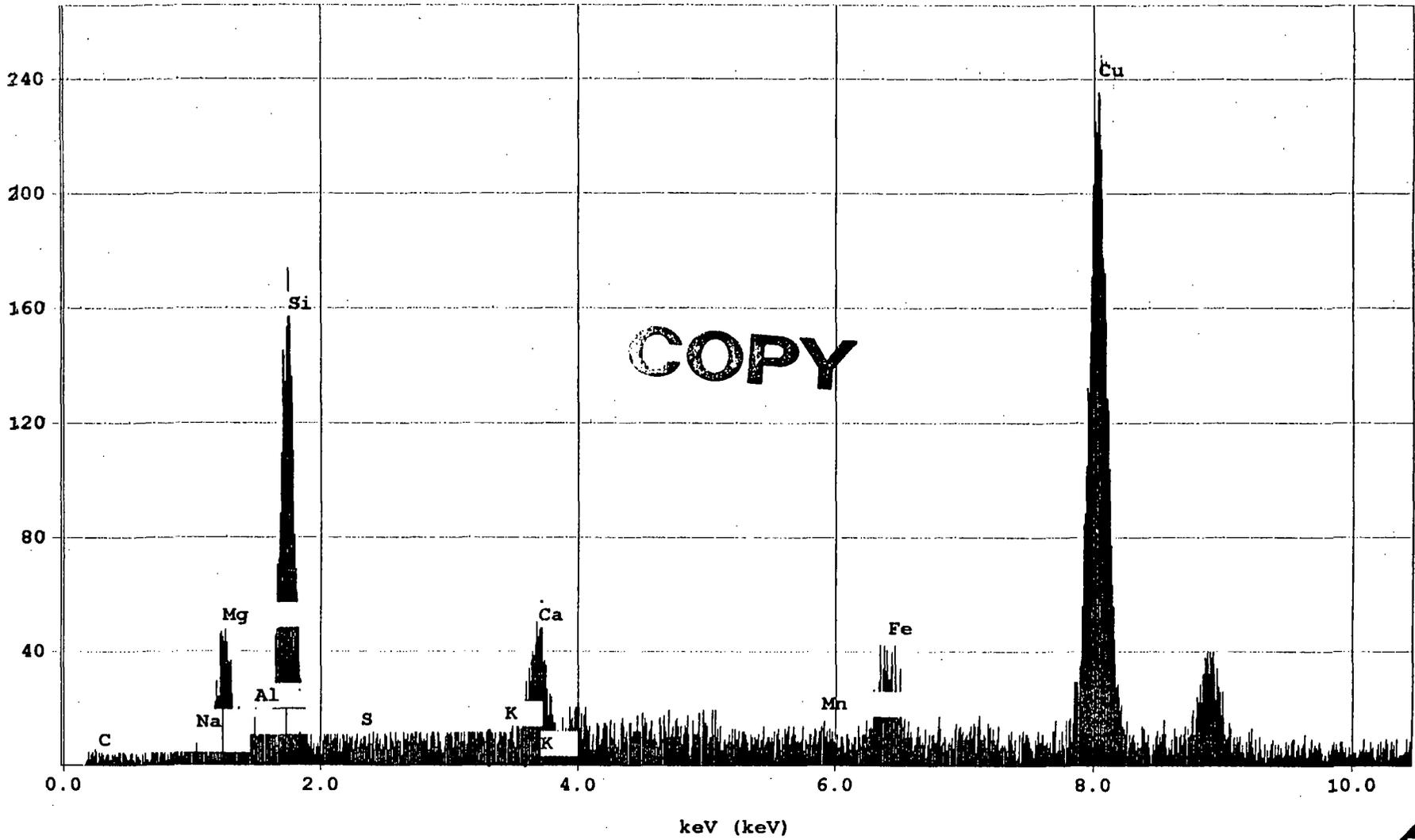


EMSL Analytical, Westmont, NJ

EPA 112849 WR-002-VO : Libby Amphibole

Thursday, September 13, 2001

ID(1):

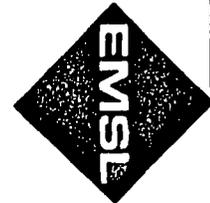
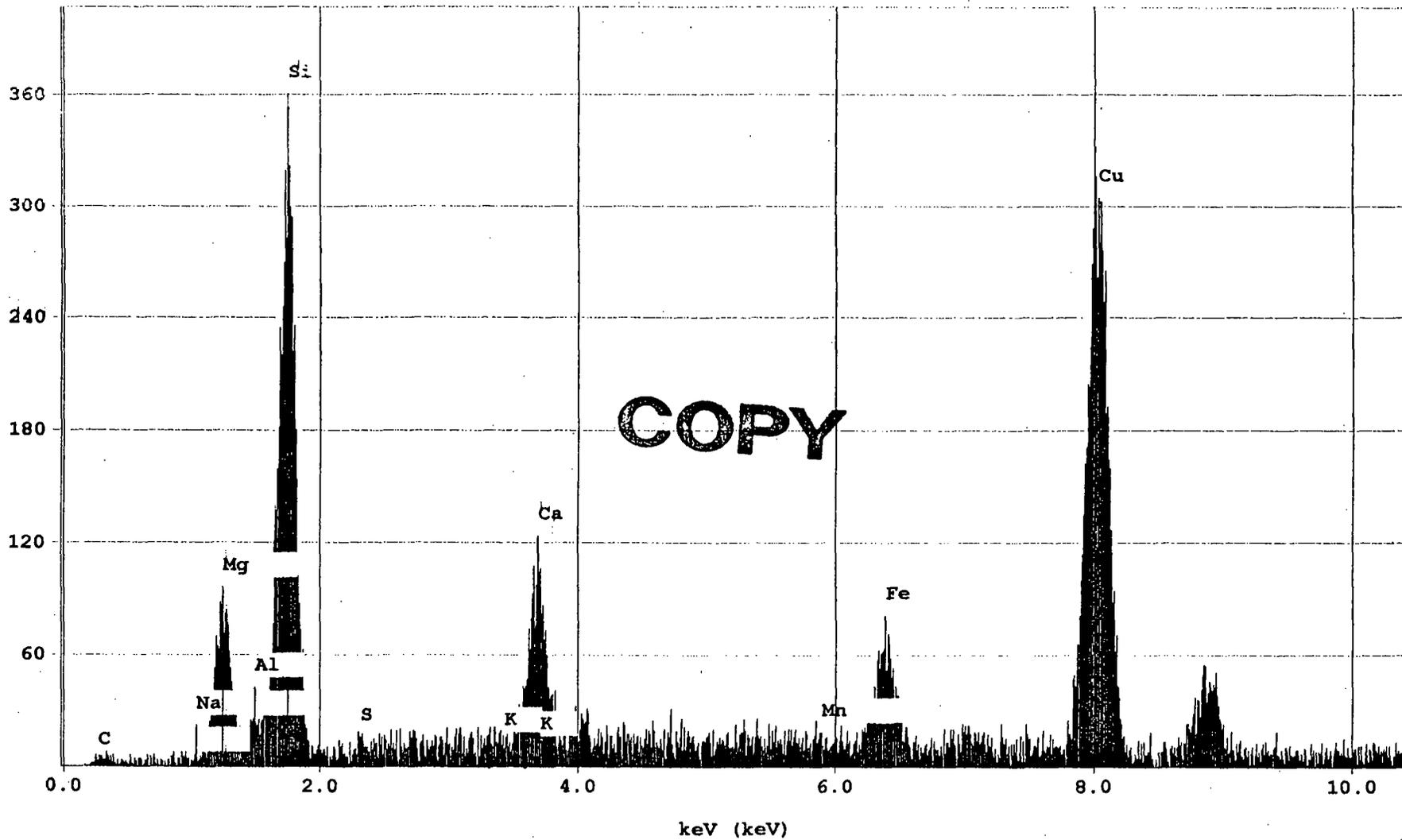


EMSL Analytical, Westmont, NJ

EPA_112849_WR-002-VO : Libby Amphibole

Thursday, September 13, 2001

ED(1):

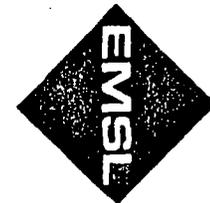
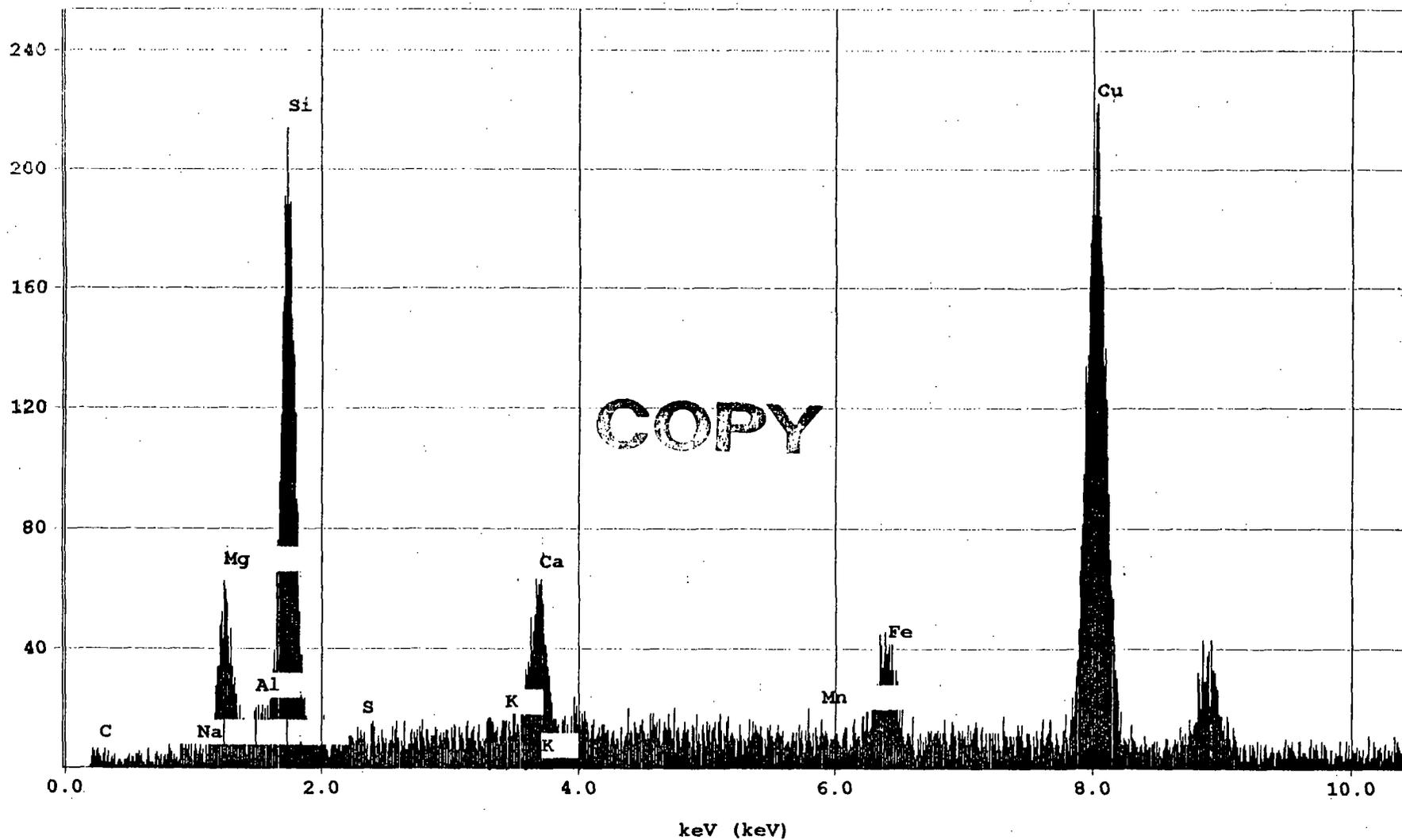


EMSL Analytical, Westmont, NJ

EPA_112849_WR-002-VO : Libby Amphibole

Thursday, September 18, 2001

IS-1):

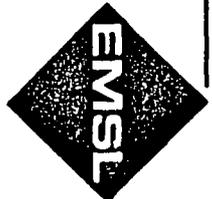
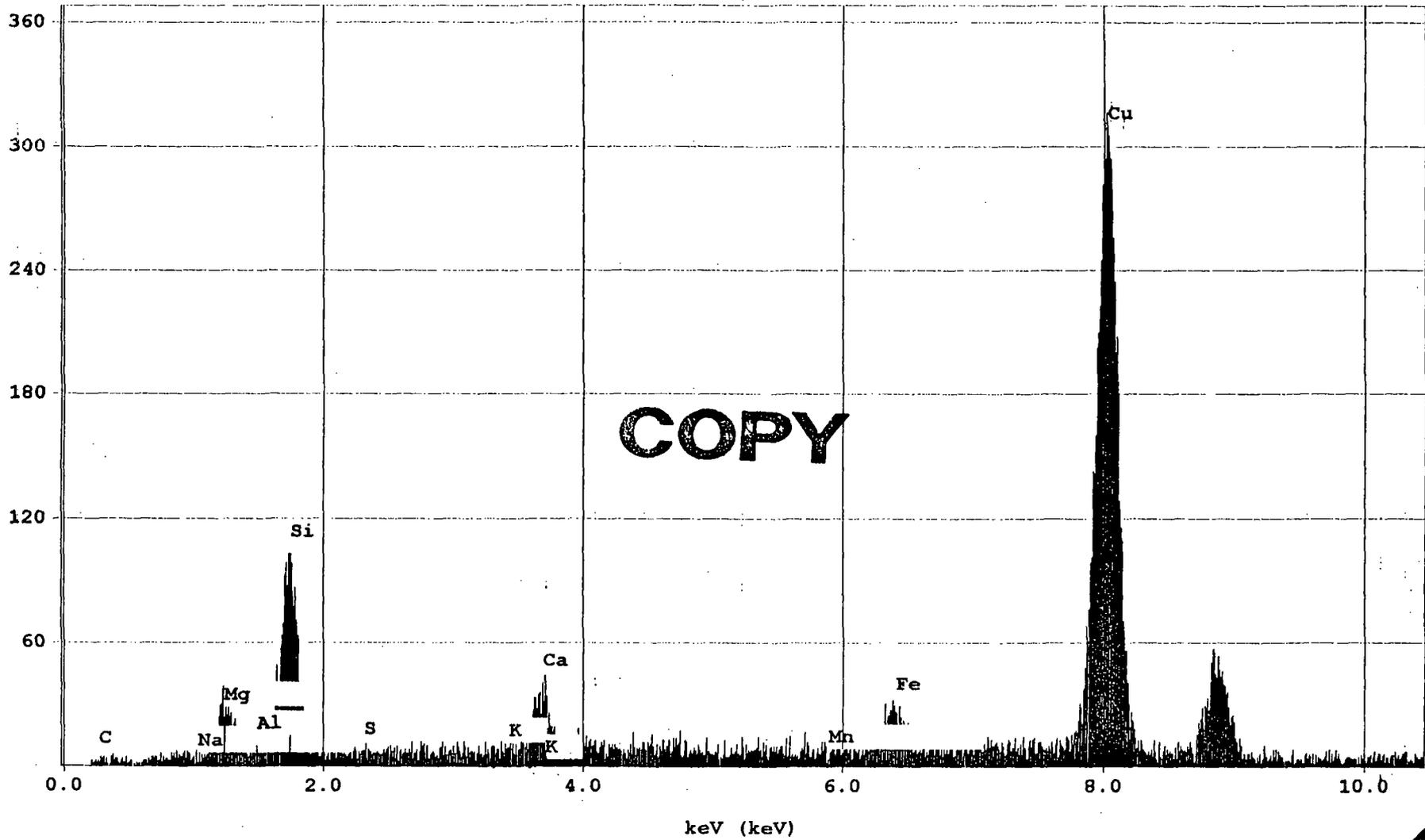


EMSL Analytical, Westmont, NJ

EPA_112849_WR-002-VO : Libby Amphibole

Thursday, September 18, 2001

Fe(L):

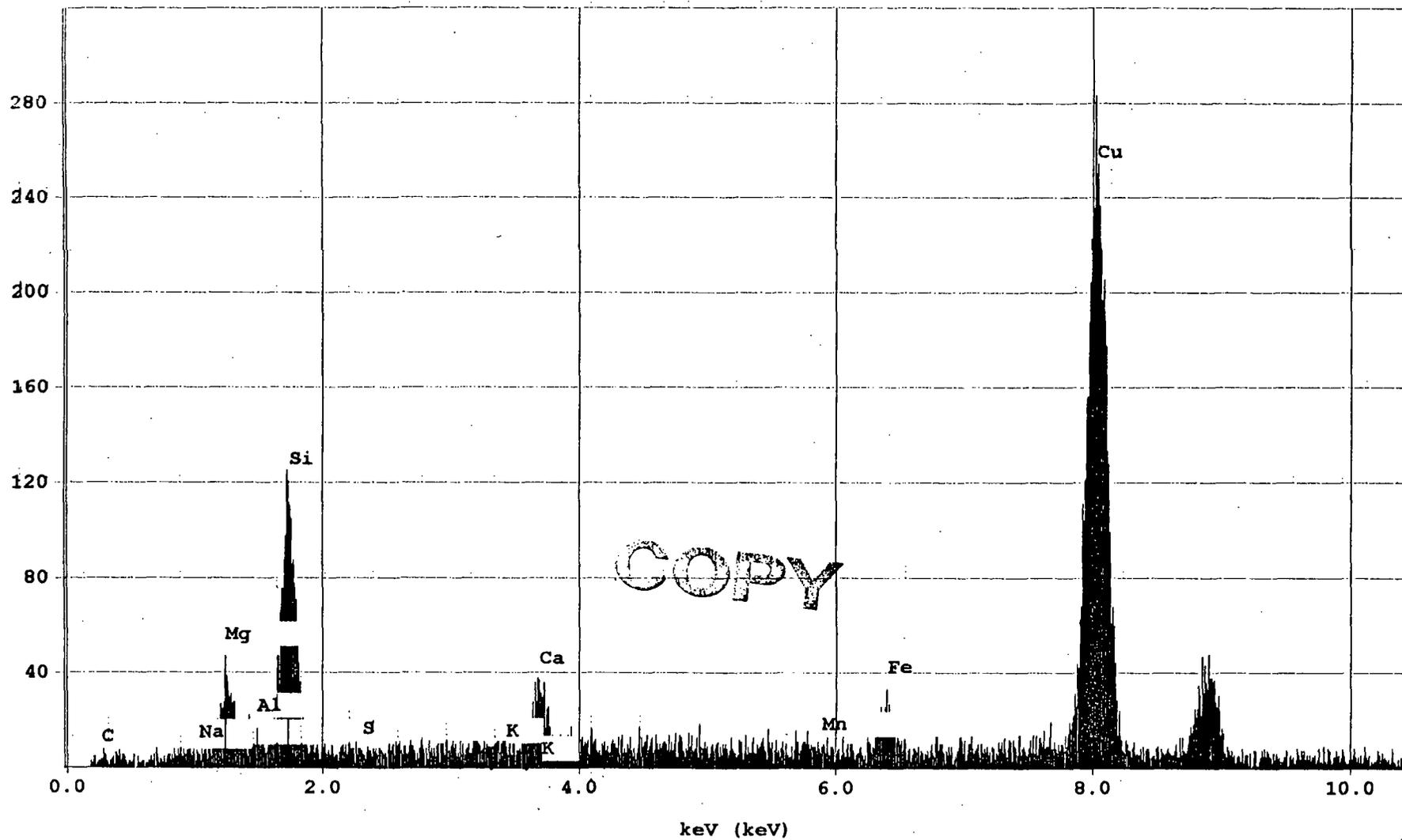


EMSL Analytical, Westmont, NJ

EPA_112849_WR-002-VO : Libby Amphibole

Thursday, September 13, 2001

10(1):

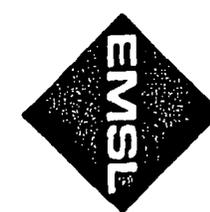
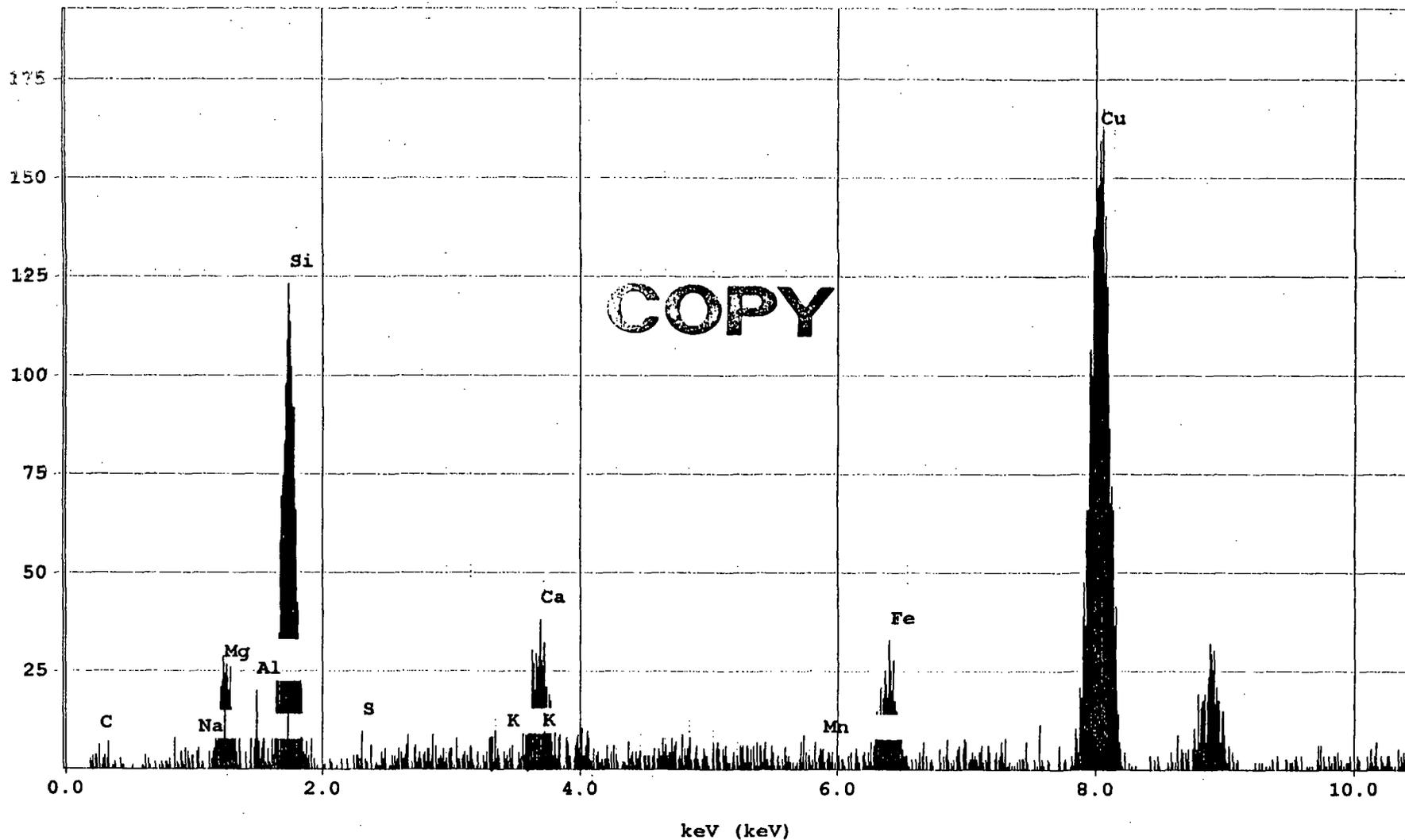


EMSL Analytical, Westmont, NJ

EPA_112849_WR-002-YO : Libby Amphibole

Thursday, September 18, 2001

rs(1):



Attn: Jim Gray
 U.S. EPA
 Environmental Services Division
 College Station Rd
 Athens, GA 30613-7799

Fax: 7063558744

Phone: 706-355-8613

ELUTRIATOR

USEPA REGION 8 SITE INVESTIGATION
 TEM Asbestos Structure Count

| | |
|--|--------------------|
| Laboratory name: | EMSL, Westmont, NJ |
| Instrument | JEOL 100 CX II (2) |
| Voltage | 100 KV |
| Magnification | 19000 X |
| Grid opening area (mm ²) | 0.0061 |
| Scale: 1L = | 1 |
| Scale: 1D = | 1 |
| Primary filter area (mm ²) | 385 |
| Secondary Filter Area (mm ²) | |

| | |
|--|-----------|
| EPA Sample Number: | WR-003-VO |
| Sample Type (A=Air, D=Dust, O=Other): | D |
| Air volume (L) or dust area (cm ²) | |
| Date received by lab | 8-7-2001 |
| Lab Job Number: | 040112849 |
| Lab Sample Number: | 0003 |
| Number of grids prepared | 4 |
| Prepared by | DS |
| Preparation date | 9-10-2001 |

60 Min

| | |
|--|-----------|
| Analyzed by | JM |
| Analysis date | 9-12-2001 |
| Method (D=Direct, I=Indirect) | D |
| Counting rules (I=ISO10312, A=ASHERA, O=Other) | I |
| Grid storage location | 2001 - C |

Row H

Secondary Prep

| | |
|---|--|
| Fraction of primary filter used: | |
| Total resuspension volume (mL) | |
| Volume filtered for secondary prep (mL) | |

Row H

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class (see below) | | | | Sketch/Comments | 1 = yes, blank = no | | | |
|------|--------------|----------------|-------------------|-------|------------|-------|----------------|---------------------------|----|---|----|-----------------|---------------------|-------|-----|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | |
| 1 | I-6 | F | | | 2.5 | 0.25 | | LA | | | | | | | | 1 |
| | | | | | 8.5 | 0.35 | | | | | NA | Si only | | | | 1 |
| | | MD10 MF | | | 3 | 0.8 | | LA | | | | | | | | 1 |
| | | MD10 MF | | | 8 | 6 | | LA | | | | | | | | 1 |
| | F-8 | MD21 MF | | | 4.9 | 0.6 | | LA | | | | | | | | 1 |
| | | MF | | | 8.5 | 8 | | LA | | | | | | | | 1 |
| | | MF | | | 6.8 | 0.4 | | LA | | | | | | | | 1 |
| | | MF | | | 3.5 | 0.15 | | LA | | | | | | | | 1 |
| | | F | | | 3.5 | 0.4 | | LA | | | | | | | | 1 |
| | | MD11 MF | | | 12 | 8 | | LA | | | | | | | | 1 |
| | | F | | | 5.2 | 0.6 | | LA | | | | | | | | 1 |
| | | F | | | 7.5 | 0.8 | | LA | | | | | | | | 1 |
| | | F | | | 1.1 | 0.12 | | LA | | | | | | | | 1 |

COPY

LA = Libby-type amphibole

OA = Other (non-Libby type) amphibole

C = Chrysotile

ELUTRIATOR

USEPA REGION 8 SITE INVESTIGATION
TEM Asbestos Structure Count

LAB NAME: EMSL, Westmont, NJ
LAB SAMPLE NO.: 0003

EPA SAMPLE NO.: WR-003-V0 60 Min.
SAMPLE TYPE: D

LAB JOB NUMBER: 04012849
GRID STORAGE LOC.: 2001-C

Row H

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class | | | | Sketch/Comments | 1 = yes, blank = no | | | | | | |
|------|--------------|----------------|-------------------|-------|------------|-------|----------------|---------------|----|----|----|-----------------|---------------------|-------|-----|--|---|---|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | | | | |
| 1 | F-8 | MD21 | | | 18 | 2 | | | | | | | | | | | | | |
| | | MF | | | 8.0 | 0.6 | | LA | | | | | | | | | | 1 | |
| | | MF | | | 4 | 0.5 | | LA | | | | | | | | | | 1 | |
| | | MD20 | | | 12 | 10 | | | | | | | | | | | | | |
| | | MF | | | 3 | 0.15 | | LA | | | | | | | | | | | 1 |
| | | MF | | | | | 2.5 | 0.5 | | LA | | | | | | | | | 1 |
| | | MD22 | | | | | 20 | 10 | | | | | | | | | | | |
| MF | | | | | 10 | 0.6 | | LA | | | | | | | | | 1 | | |
| | | MF | | | 13.2 | 1.0 | | LA | | | | | | | | | | 1 | |
| | | F | | | 16 | 1.0 | | LA | | | | | | | | | | 1 | |
| 2 | G-7 | MD11 | | | 20 | 10 | | | | | | | | | | | | | |
| | | MF | | | 7.5 | 1.0 | | LA | | | | | | | | | | 1 | |
| | | MD10 | | | 4.6 | 3 | | | | | | | | | | | | | |
| | | MF | | | 4 | 0.5 | | LA | | | | | | | | | | | 1 |
| | | MD10 | | | 20 | 10 | | | | | | | | | | | | | |
| | | MF | | | 4 | 0.7 | | LA | | | | | | | | | | | 1 |
| | | MD11 | | | 9 | 0.5 | | | | | | | | | | | | | |
| MF | | | | | 9 | 0.1 | | LA | | | | | | | | | 1 | | |
| | | MD11 | | | 20 | 4.5 | | | | | | | | | | | | | |
| | | MF | | | 19 | 2 | | LA | | | | | | | | | | 1 | |
| | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | |

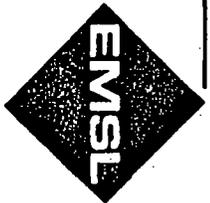
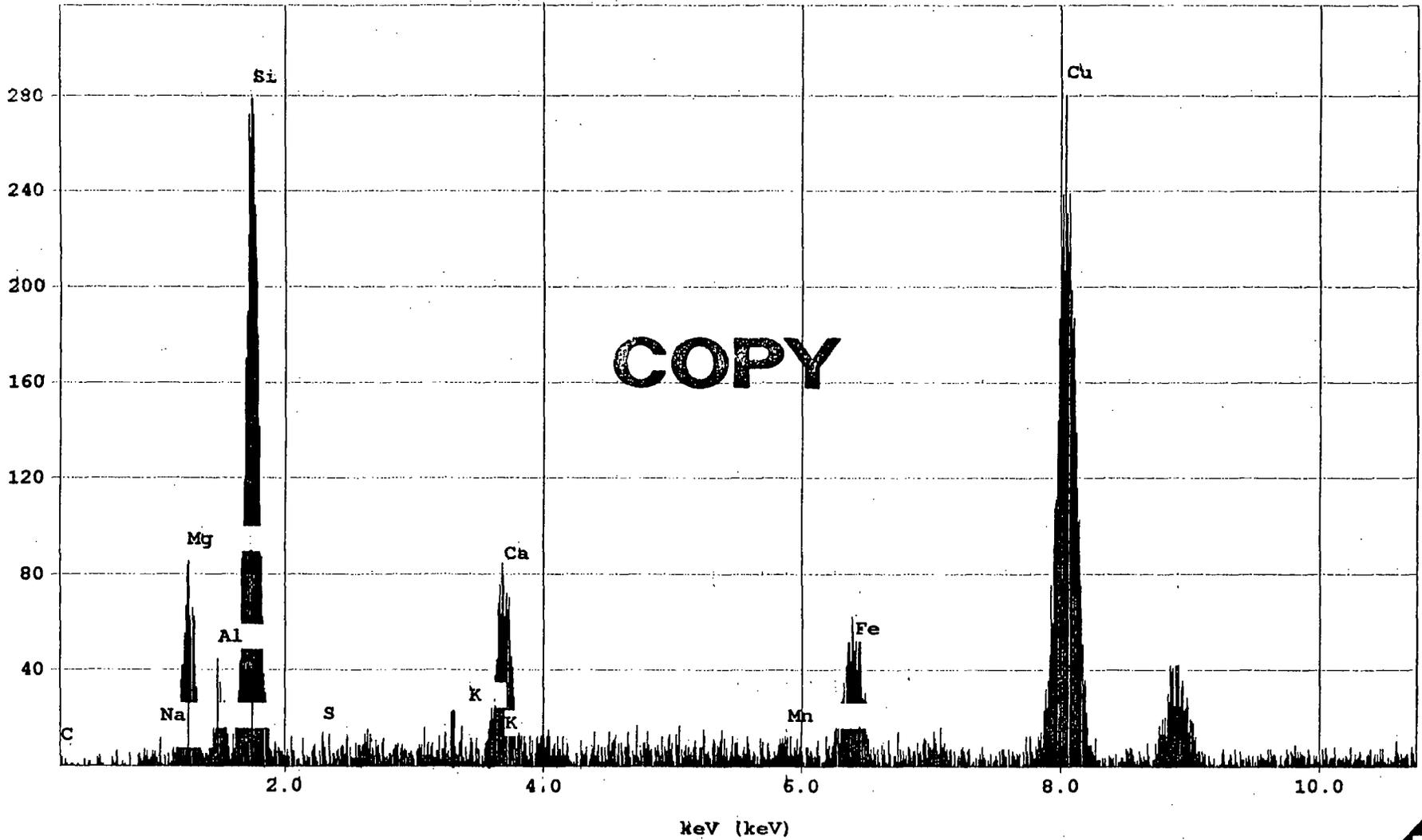
COPY

EMSL Analytical, Westmont, NJ

CDM 112849 WR-003-VO : Libby Amphibole

Wednesday, September 12, 2001

ID(1):

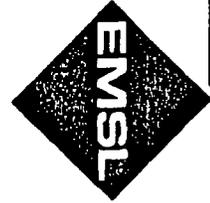
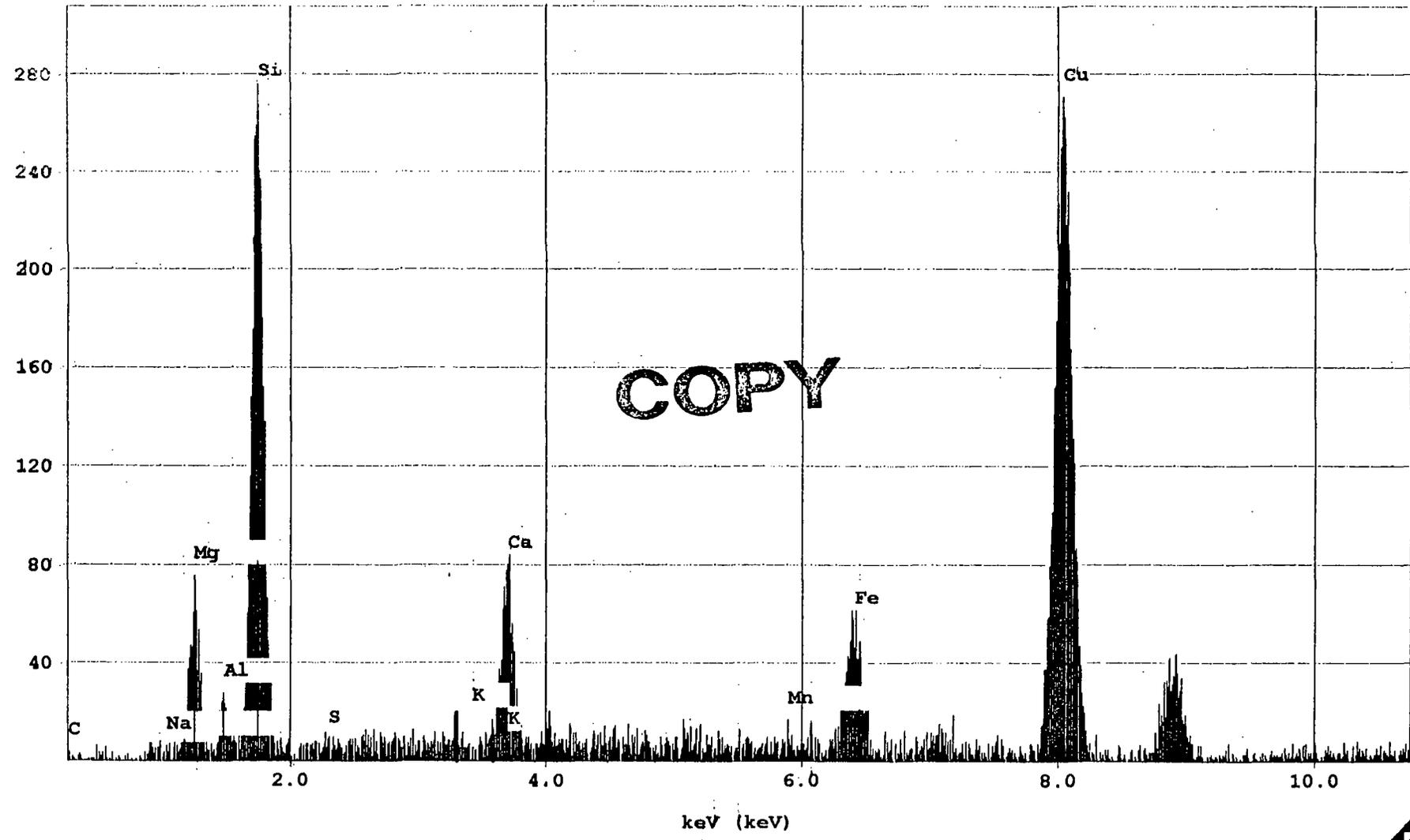


EMSL Analytical, Westmont, NJ

CDM_112849_WR-003-VO : Libby Amphibole

Wednesday, September 12, 2001

ID(1):

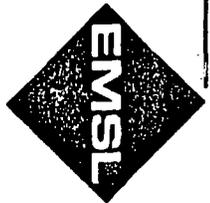
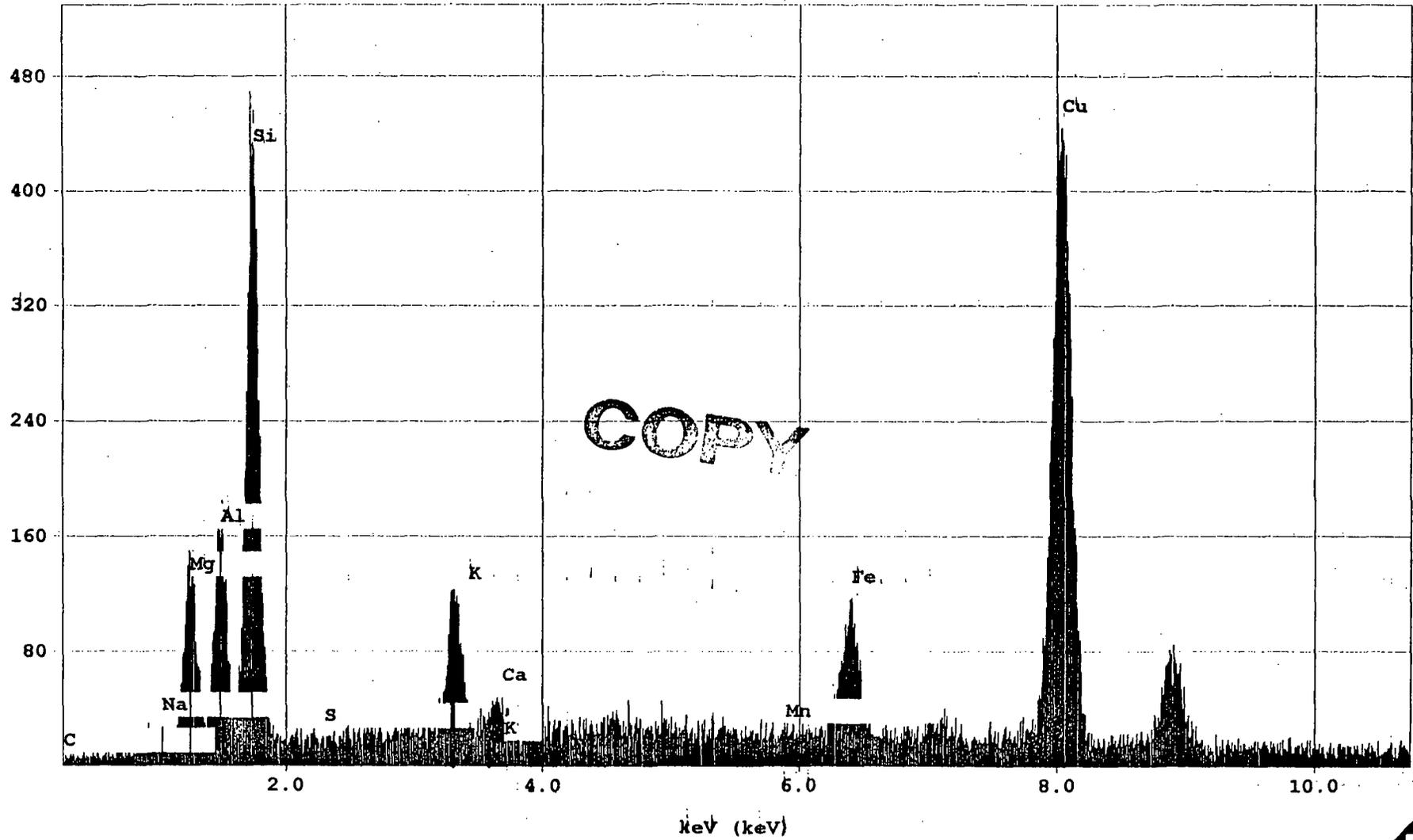


EMSL Analytical, Westmont, NJ

CDM_112849_WR-003-VO : Libby Amphibole

Wednesday, September 12, 2001

ID(1):

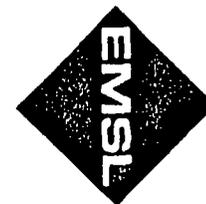
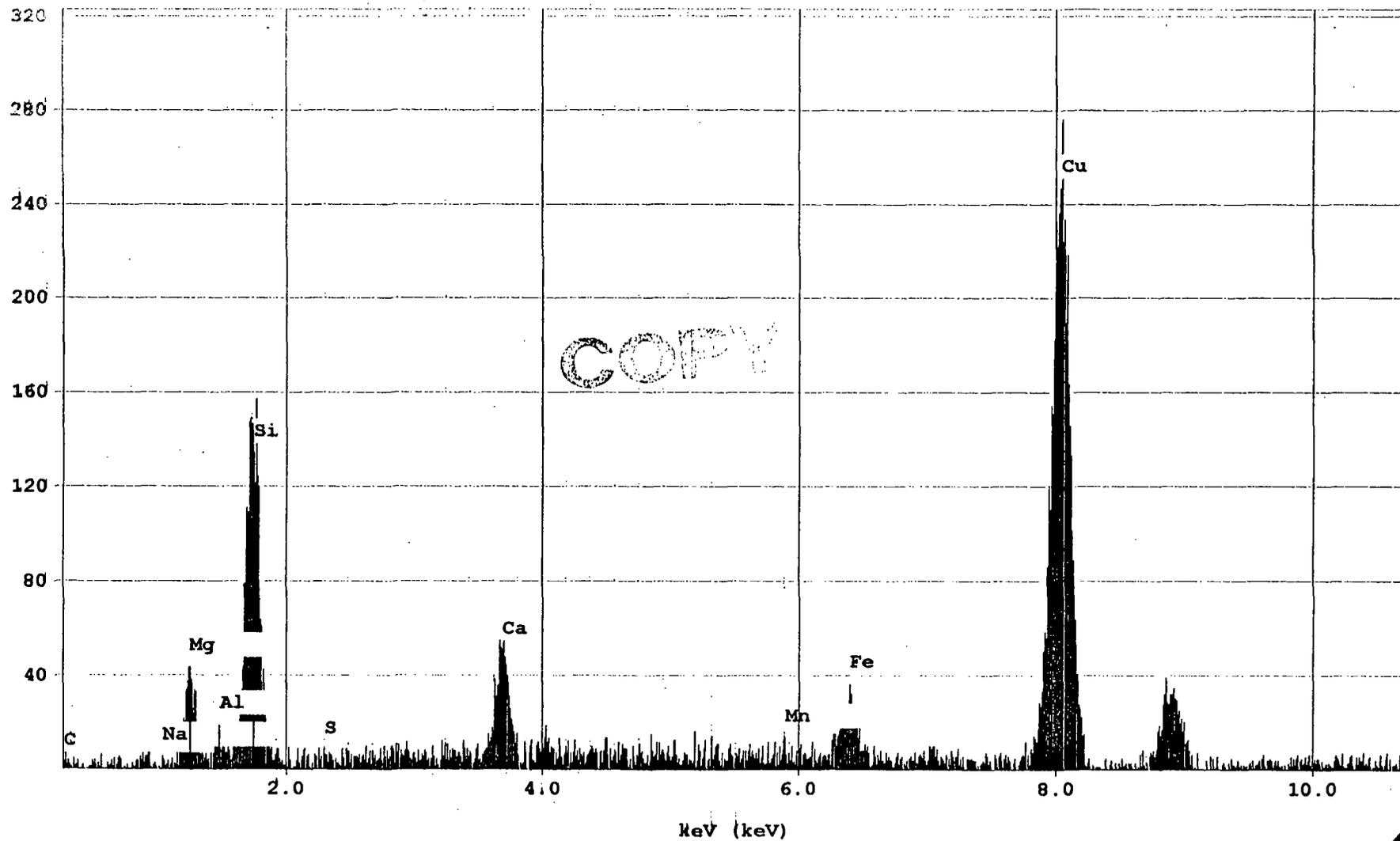


EMSL Analytical, Westmont, NJ

ODM_112849_WR-003-VO : Libby Amphibole

Wednesday, September 12, 2001

ID(1):

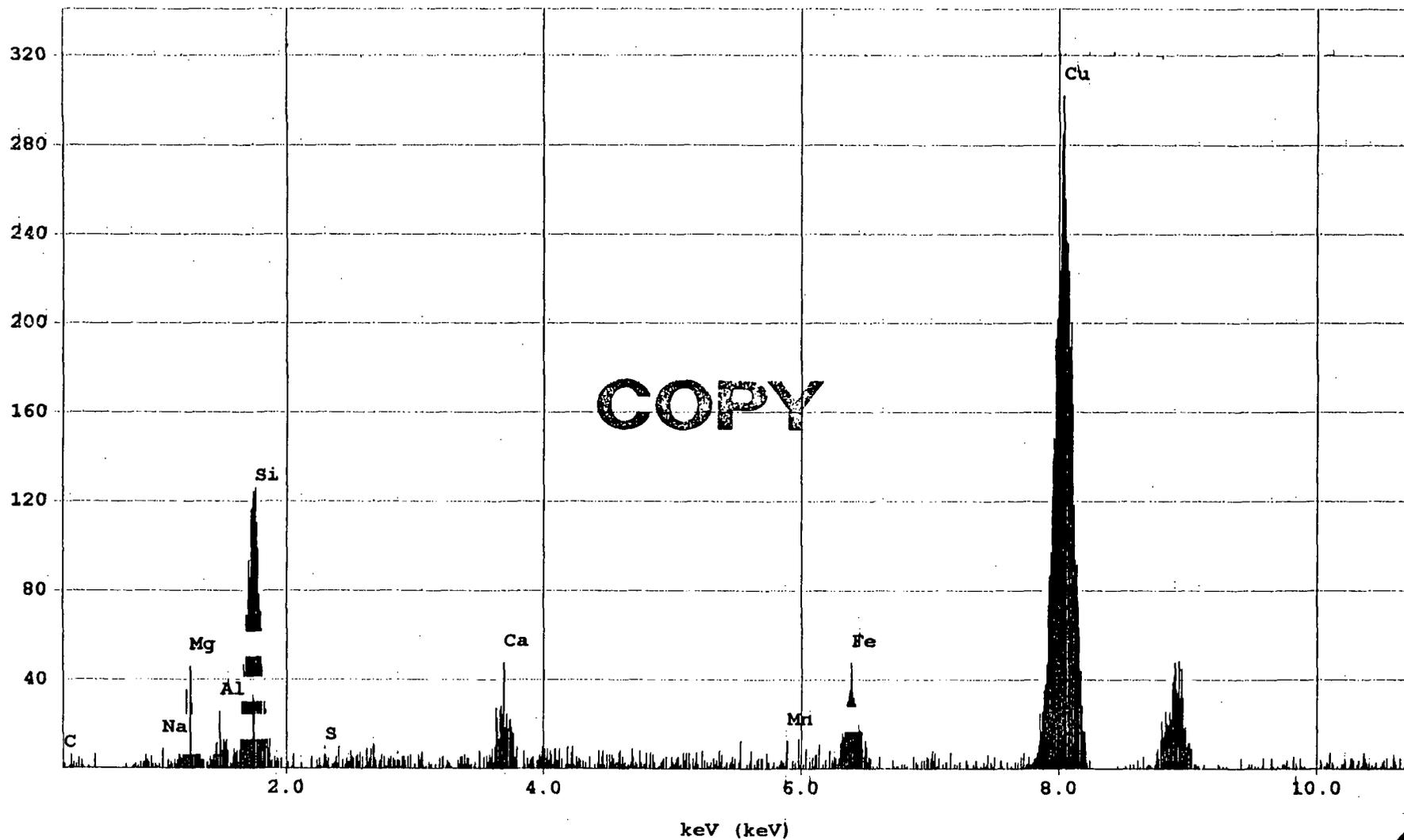


EMSL Analytical, Westmont, NJ

CDM_112849_WR-003-VO : Libby Amphibole

Wednesday, September 12, 2001

ID(1):

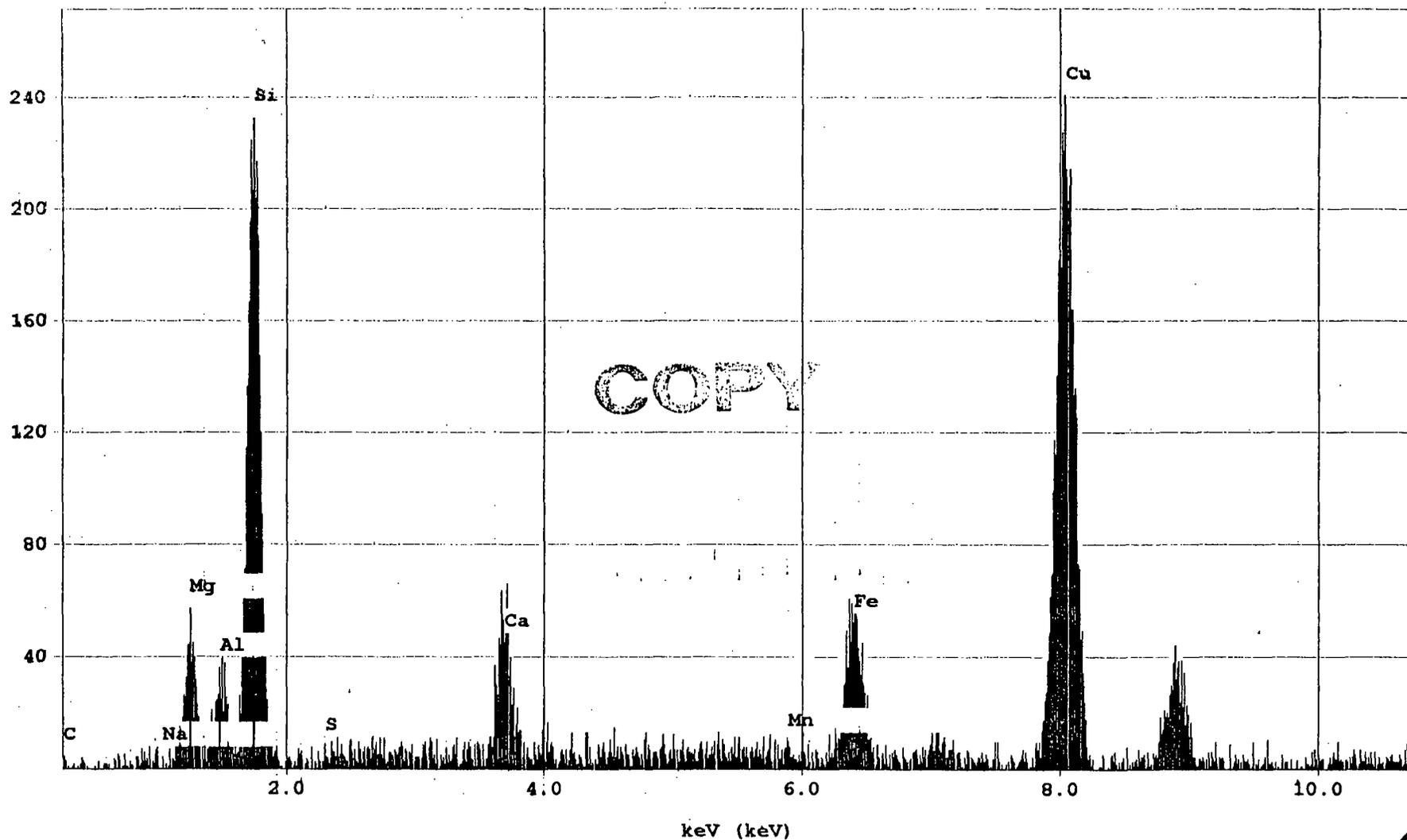


EMSL Analytical, Westmont, NJ

CDM 112849 WR-003-VO : Libby Amphibole

Wednesday, September 12, 2001

ID(1):

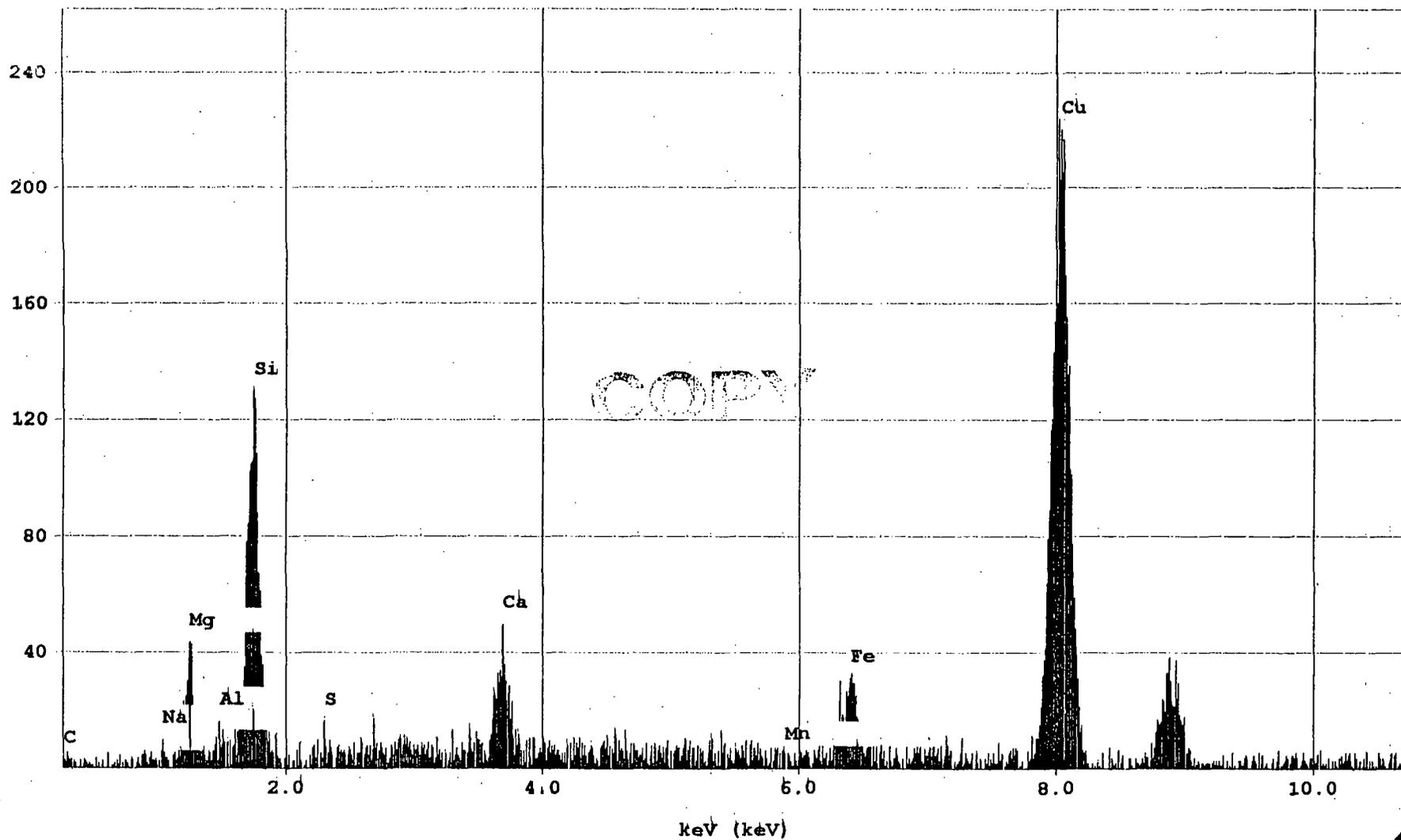


EMSL Analytical, Westmont, NJ

CDM 112849 WR-003-VO : Libby Amphibole

Wednesday, September 12, 2001

ID(1):

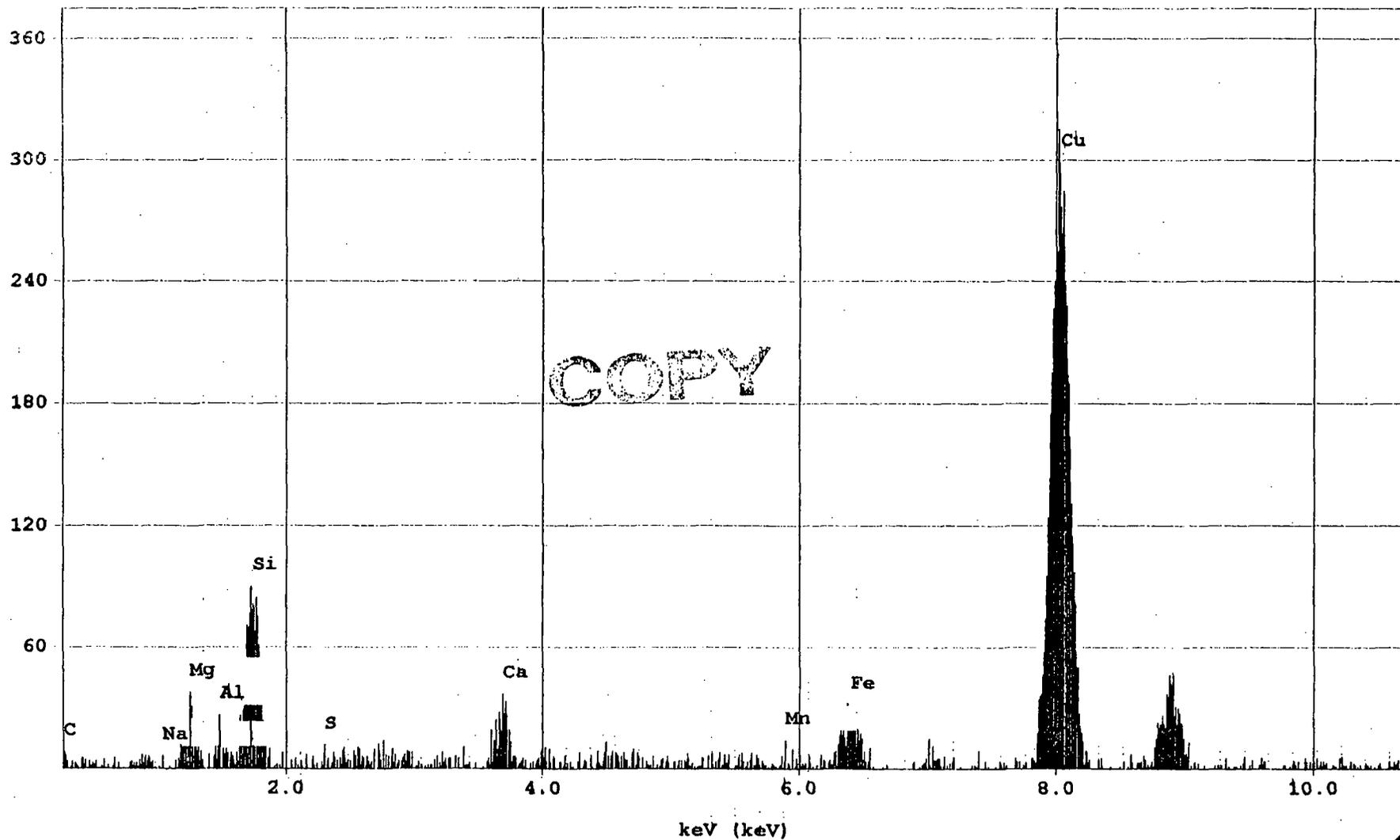


EMSL Analytical, Westmont, NJ

CDM_112849_WR-003-VO : Libby Amphibole

Wednesday, September 12, 2001

ID(1):

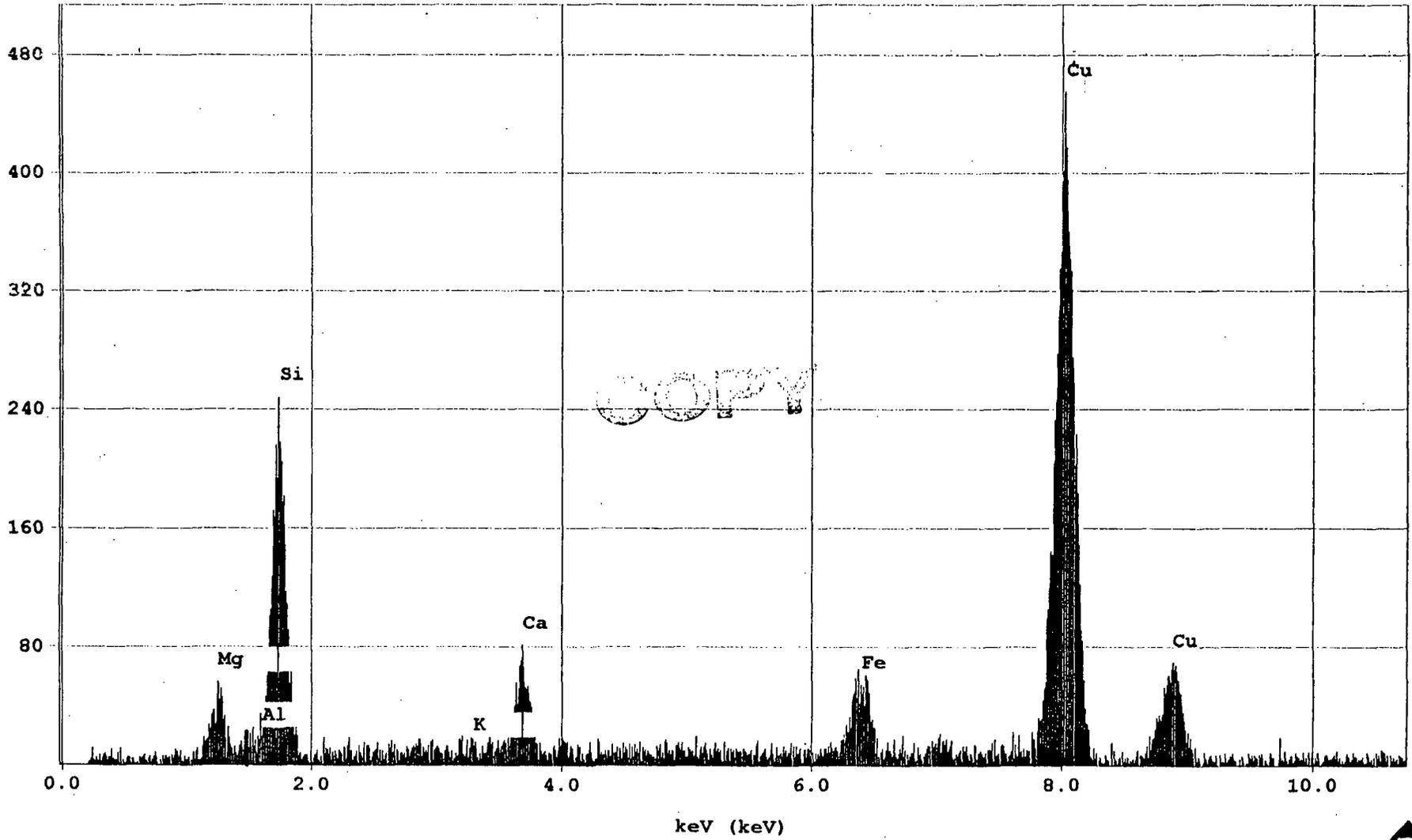


EMSL Analytical, Westmont, NJ

EPA_112849_WR-004-VO: Libby Amphibole

Tuesday, September 18, 2001

EM(I):

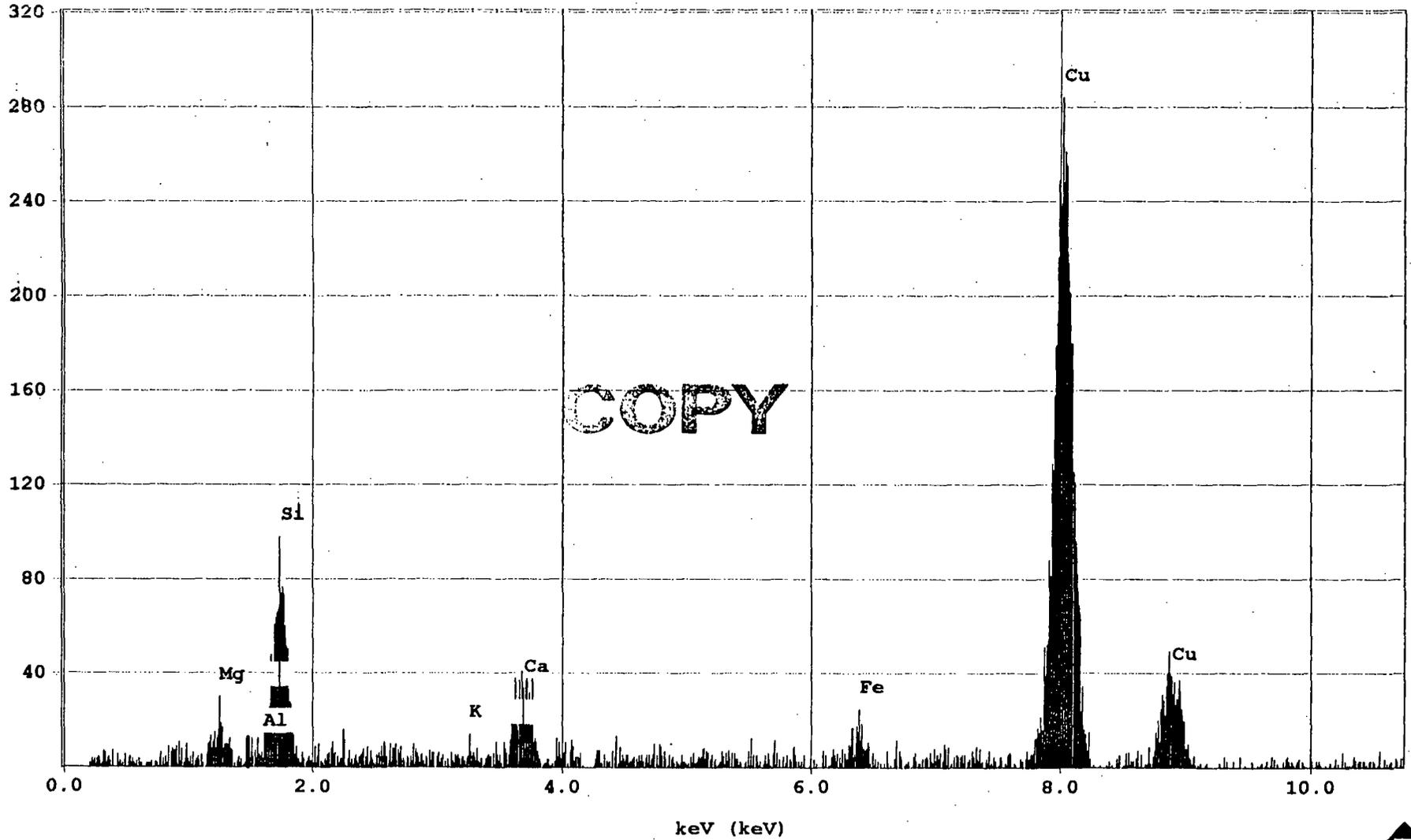


EMSL Analytical, Westmont, NJ

EPA_112849_WR-004-V0: Libby Amphibole

Tuesday, September 18, 2001

11(1):



Attn: Jim Gray
 U.S. EPA
 Environmental Services Division
 College Station Rd
 Athens, GA 30613-7799

ELUTRIATOR

Fax: 7063558744

Phone: 706-355-8613

USEPA REGION 8 SITE INVESTIGATION
 TEM Asbestos Structure Count

| | |
|--|--------------------|
| Laboratory name: | EMSL, Westmont, NJ |
| Instrument | JEOL 100 CX II (2) |
| Voltage | 100 KV |
| Magnification | 19000 X |
| Grid opening area (mm ²) | 0.0061 |
| Scale: 1L = | 1 |
| Scale: 1D = | 1 |
| Primary filter area (mm ²) | |
| Secondary Filter Area (mm ²) | |

| | |
|--|-----------|
| EPA Sample Number: | WR-005-V0 |
| Sample Type (A=Air, D=Dust, O=Other): | D |
| Air volume (L) or dust area (cm ²) | |
| Date received by lab | 8-7-2001 |
| Lab Job Number: | 040112849 |
| Lab Sample Number: | 000 |
| Number of grids prepared | 4 |
| Prepared by | DS |
| Preparation date | 9-10-2001 |

| | |
|---|----------|
| Analyzed by | |
| Analysis date | |
| Method (D=Direct, I=Indirect) | |
| Counting rules (I=ISO10312, A=AHERA, O=Other) | I |
| Grid storage location | 2001 - C |
| Secondary Prep | |
| Fraction of primary filter used: | |
| Total resuspension volume (mL) | |
| Volume filtered for secondary prep (mL) | |

66
min

Row Q

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class (see below) | | | | Sketch/Comments | 1 = yes, blank = no | | | |
|------|--------------|----------------|-------------------|-------|------------|-------|----------------|---------------------------|----|---|----|-----------------|---------------------|-------|-----|--|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | |
| 1 | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |
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| | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |

OVERLOADED

COPY

Row Q

LA = Libby-type amphibole

OA = Other (non-Libby type) amphibole

C = Chrysotile

Attn: Jim Gray
 U.S. EPA
 Environmental Services Division
 College Station Rd
 Athens, GA 30613-7799

ELUTRIATOR

Fax: 7063558744

Phone: 706-355-8613

USEPA REGION 8 SITE INVESTIGATION
 TEM Asbestos Structure Count

| | |
|--|--------------------|
| Laboratory name: | EMSL, Westmont, NJ |
| Instrument | JEOL 100 CX II (2) |
| Voltage | 100 KV |
| Magnification | 19000 X |
| Grid opening area (mm ²) | 0.0061 |
| Scale: 1L = | 1 |
| Scale: 1D = | 1 |
| Primary filter area (mm ²) | 385 |
| Secondary Filter Area (mm ²) | |

| | |
|--|-----------|
| EPA Sample Number: | WR-005-VO |
| Sample Type (A=Air, D=Dust, O=Other): | D |
| Air volume (L) or dust area (cm ²) | |
| Date received by lab | 8-7-2001 |
| Lab Job Number: | 040112849 |
| Lab Sample Number: | 0005 |
| Number of grids prepared | 4 |
| Prepared by | DS |
| Preparation date | 9-10-2001 |

10 min

| | |
|--|-----------|
| Analyzed by | AS |
| Analysis date | 9-18-2001 |
| Method (D=Direct, I=Indirect) | |
| Counting rules (I=ISO10312, A=ASHERA, O=Other) | I |
| Grid storage location | 2001_C |

Row P

| | |
|---|--|
| Secondary Prep | |
| Fraction of primary filter used: | |
| Total resuspension volume (mL) | |
| Volume filtered for secondary prep (mL) | |

Row P

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class (see below) | | | | Sketch/Comments | 1 = yes, blank = no | | | |
|------|--------------|----------------|-------------------|-------|------------|-------|----------------|---------------------------|----|---|----|--------------------|---------------------|-------|-----|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | |
| 1 | G-6 | F | | | 4.0 | 0.3 | LA | | | | | | | | | |
| | I-8 | F | | | 7.5 | 1.0 | | | | | NA | Al, Si, Fe | | | | 1 |
| | | F | | | 7.0 | 0.6 | LA | | | | | | | | | 1 |
| | C-8 | F | | | 2 | 8.5 | LA | | | | | | | | | 1 |
| | F-12 | F | | | 4.25 | 0.4 | LA | | | | | | | | | 1 |
| | | F | | | 3.6 | 0.8 | LA | | | | | | | | | 1 |
| | | | | | 7.0 | 0.5 | | | | | NA | Mg, Al, Si, Ca, Fe | | | | 1 |
| | | | | | 8.0 | 1.0 | | | | | NA | Mg, Al, Si, Ca, Fe | | | | 1 |
| | K-12 | ND | | | | | | | | | | | | | | |
| 2 | L-14 | ND | | | | | | | | | | | | | | |

COPY

LA = Libby-type amphibole

OA = Other (non-Libby type) amphibole

USEPA REGION 8 LIBBY SITE INVESTIGATION
TEM Asbestos Structure Count

LAB NAME: EMSL Westmont NJ EPA SAMPLE NO: WR-005-V0 10 Min. LAB JOB NUMBER: 04012849
 LAB SAMPLE NO: 0005 SAMPLE TYPE: D GRID STORAGE LOC.: 2001-C Row P

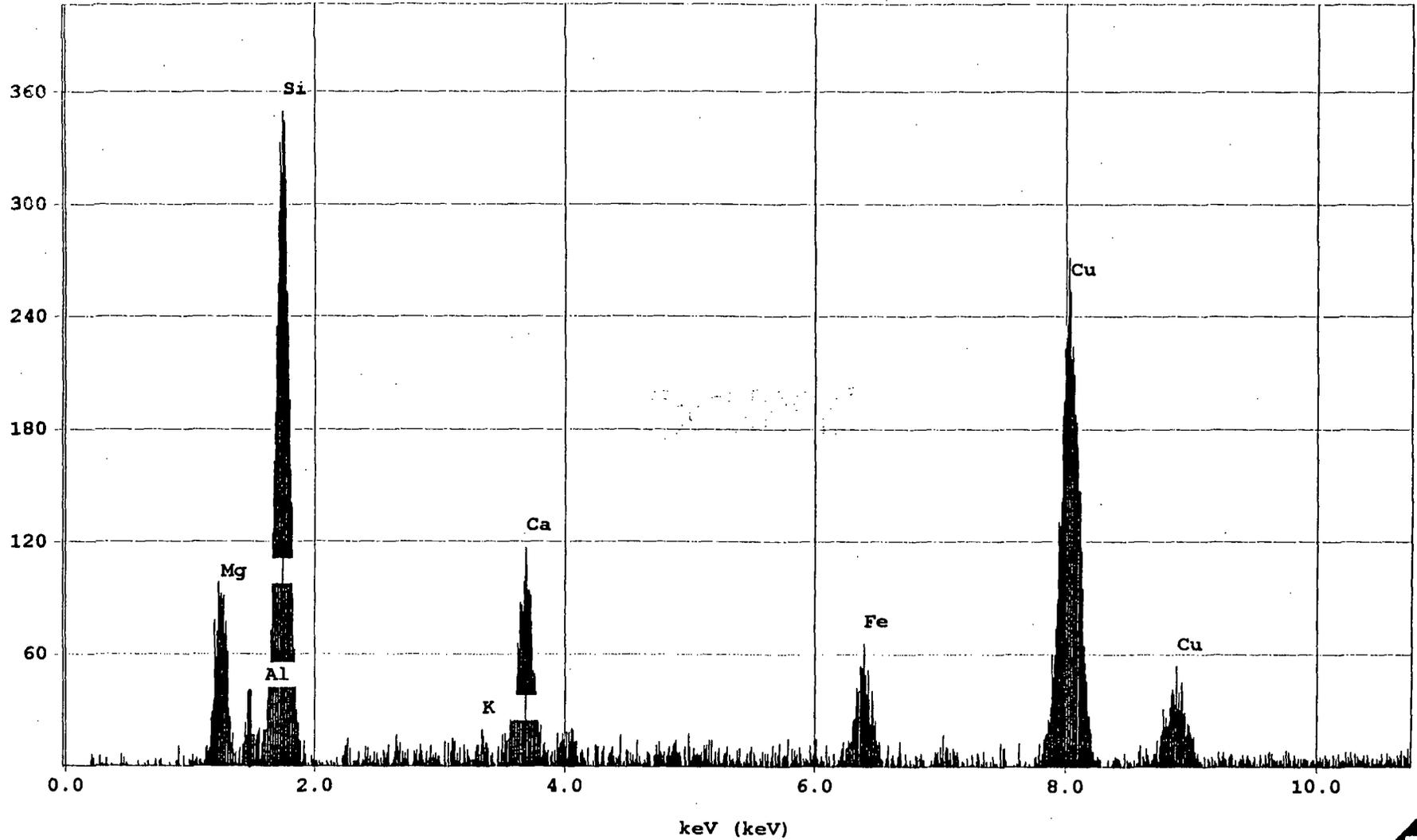
Row P

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class | | | | Sketch/Comments | 1 = yes, blank = no | | | | |
|------|--------------|----------------|-------------------|-------|------------|-------|----------------|---------------|----|---|----|-------------------|---------------------|-------|-----|--|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | | |
| | D-5 | ND | | | | | | | | | | | | | | | |
| | H-3 | | | | 5.5 | 1.25 | | | | | NA | Mg, Al, Si, C, Fe | | | | | 1 |
| | K-6 | | | | 5.3 | 0.3 | | | | | NA | Al, Si, Ti, Fe | | | | | 1 |
| | J-8 | ND | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
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| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |

COPY

EMSL Analytical, Westmont, NJ
EPA_112849_WR-005-VO: Libby Amphibole
Tuesday, September 18, 2001

(1):

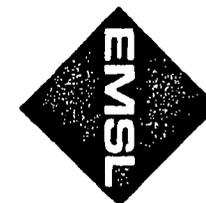
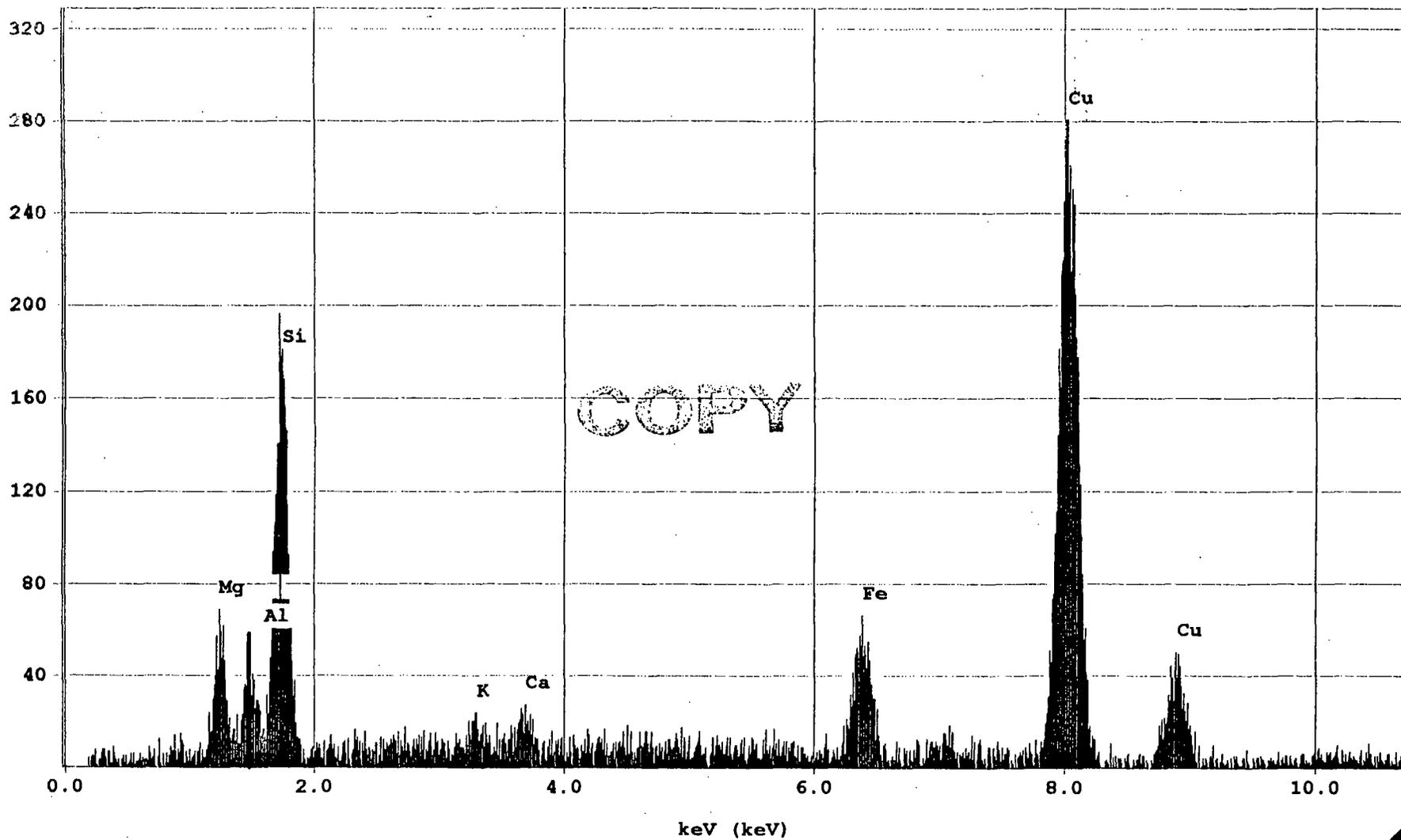


EMSL Analytical, Westmont, NJ

EPA_112849_WR-005-V0: Libby Amphibole

Tuesday, September 18, 2001

17(1):

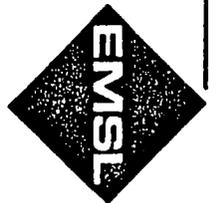
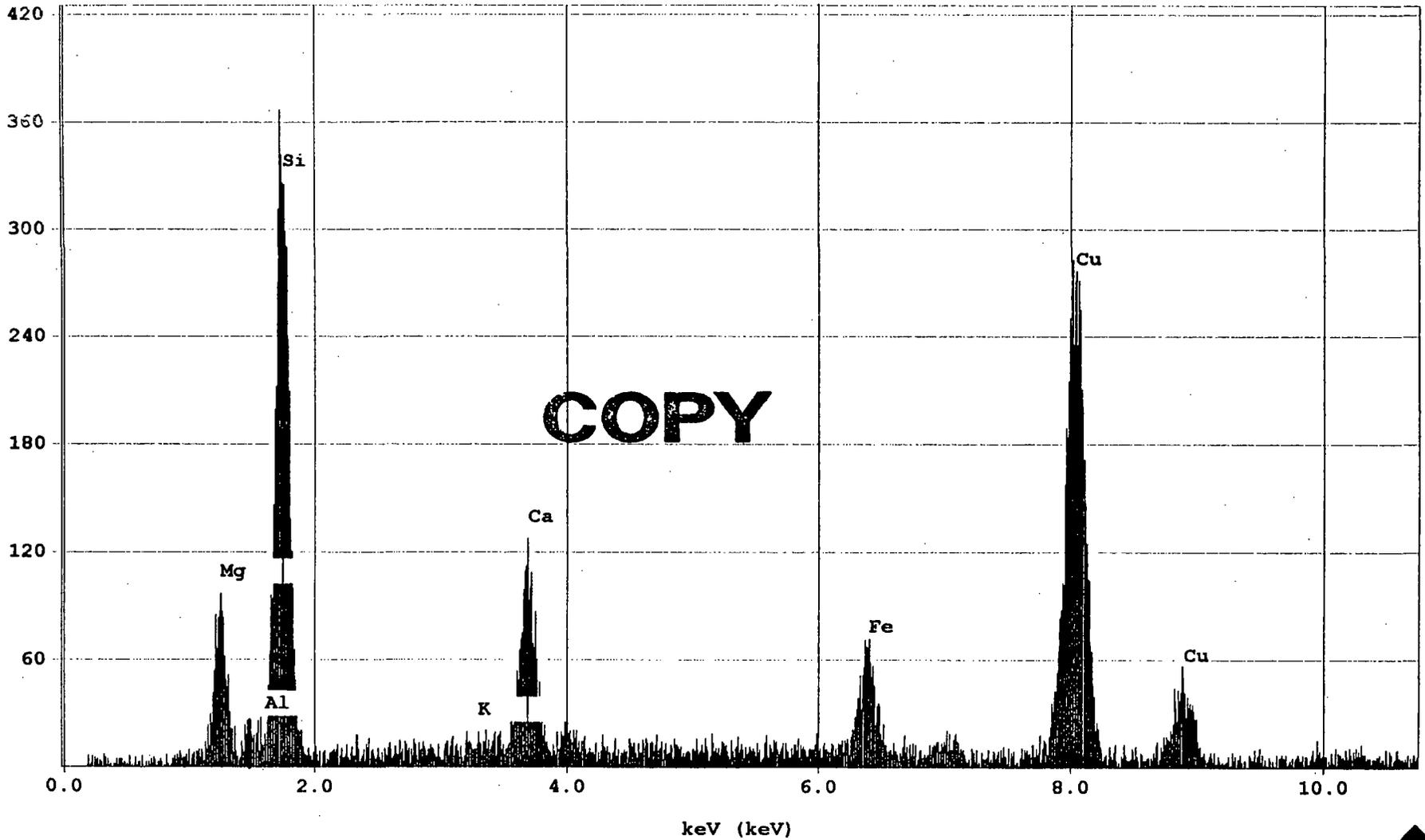


EMSL Analytical, Westmont, NJ

EPA_112849_WR-005-VO: Libby Amphibole

Tuesday, September 18, 2001

IT(1):



Attn: Jim Gray
 U.S. EPA
 Environmental Services Division
 College Station Rd
 Athens, GA 30613-7799

Fax: 7063558744

Phone: 706-355-8613

ELUTRIATOR

USEPA REGION 8 SITE INVESTIGATION
 TEM Asbestos Structure Count

| | |
|--|--------------------|
| Laboratory name: | EMSL, Westmont, NJ |
| Instrument | JEOL 100 CX II (2) |
| Voltage | 100 KV |
| Magnification | 19000 X |
| Grid opening area (mm ²) | 0.0061 |
| Scale: 1L = | 1 |
| Scale: 1D = | 1 |
| Primary filter area (mm ²) | |
| Secondary Filter Area (mm ²) | |

| | |
|--|-----------|
| EPA Sample Number: | WR-006-V0 |
| Sample Type (A=Air, D=Dust, O=Other): | D |
| Air volume (L) or dust area (cm ²) | |
| Date received by lab | 8-7-2001 |
| Lab Job Number: | 040112849 |
| Lab Sample Number: | 0006 |
| Number of grids prepared | 4 |
| Prepared by | DS |
| Preparation date | 9-10-2001 |

60 min

| | |
|--|-----------|
| Analyzed by | XMS |
| Analysis date | 9-18-2001 |
| Method (D=Direct, I=Indirect) | |
| Counting rules (I=ISO10312, A=ASHERA, O=Other) | I |
| Grid storage location | 2001 - C |

Row R

Secondary Prep

| | |
|---|--|
| Fraction of primary filter used: | |
| Total resuspension volume (mL) | |
| Volume filtered for secondary prep (mL) | |

Row R

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class (see below) | | | | Sketch/Comments | 1 = yes, blank = no | | |
|------|--------------|----------------|-------------------|-------|------------|-------|----------------|---------------------------|----|---|----|-----------------------|---------------------|-------|-----|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS |
| 1 | D-8 | | | | 11 | 2.5 | | | | | NA | Mg, Al, Si, K, Ca, Fe | | | 1 |
| | | F | | | 5.5 | 0.5 | | LA | | | | | | | 1 |
| | | MDIO MF | | | 11 | 8 | | LA | | | | | | | 1 |
| | G-9 | MDII MF | | | 14 | 9.5 | | LA | | | | | | | 1 |
| | | F | | | 2.5 | 0.3 | | LA | | | | | | | 1 |
| | I-7 | | | | 6.0 | 0.5 | | | | | NA | | | | |
| | | F | | | 5.5 | 0.3 | | LA | | | | | | | 1 |
| | | | | | 7.0 | 0.35 | | | | | NA | Mg, Si, Fe | | | 1 |
| | M-6 | MDII MF | | | 18 | 7 | | LA | | | | | | | 1 |
| | K-13 | ND | | | | | | | | | | | | | |

LA = Libby-type amphibole

OA = Other (non-Libby type) amphibole

C = Chrysotile

USEPA REGION 8 LIBBY SITE INVESTIGATION
TEM Asbestos Structure Count

LAB NAME: EMSL, Westmont, NJ
LAB SAMPLE NO: 0006

EPA SAMPLE NO: WR-006-V0 60 Min.
SAMPLE TYPE: D

LAB JOB NUMBER: 040112849
GRID STORAGE LOC.: 2001-C

Row R

Row R

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class | | | | Sketch/Comments | 1 = yes, blank = no | | | |
|------|----------------|----------------|-------------------|-------|--------------|------------|----------------|---------------|----|---|----|--------------------|---------------------|-------|-----|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | |
| 2 | N-5 | F | | | 2.8 | 0.4 | LA | | | | | | | | | 1 |
| | E-9 | | | | 10 | 2 | | | | | NA | Mg, Si, Ca, Fe | | | | 1 |
| | J-9 | | | | 8.0 | 0.25 | | | | | NA | | | | | 1 |
| | | MDII MF | | | 24 18 | 5 0.9 | LA | | | | | | | | | 1 |
| | | | | | 35 | 3.5 | | | | | NA | Mg, Al, Si, Ca, Fe | | | | 1 |
| | C-9 | | | | | | | | | | | | | | | |
| | D-6 | | | | 5.5 | 0.7 | LA | | | | | | | | | 1 |
| | F-12 | MDII MF | | | 13.5 13.0 | 4.5 0.5 | LA | | | | | | | | | 1 |
| | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |
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| | | | | | | | | | | | | | | | | |

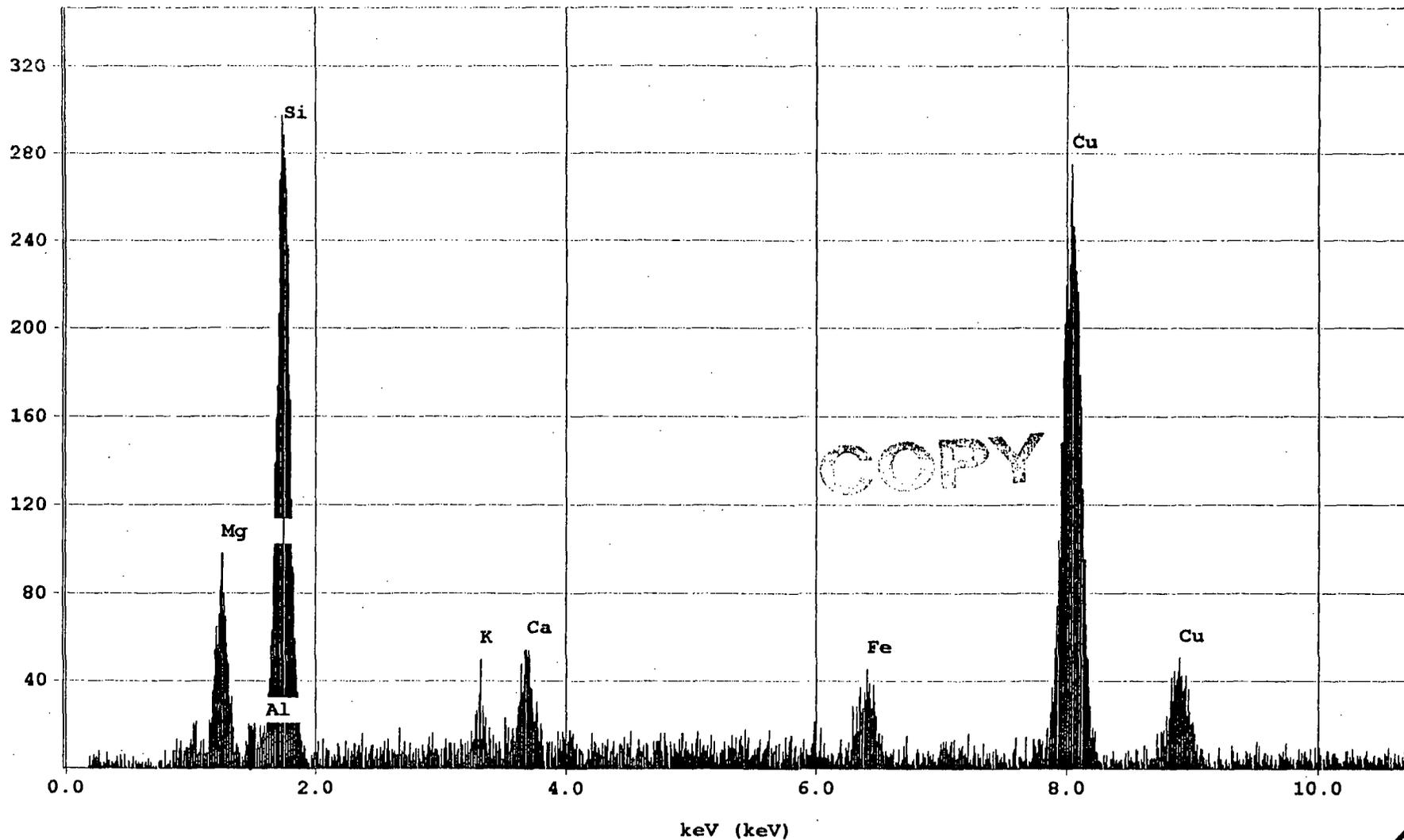
COPY

EMSL Analytical, Westmont, NJ

EPA_112849_WR-006-VO: Libby Amphibole

Tuesday, September 18, 2001

11-1:

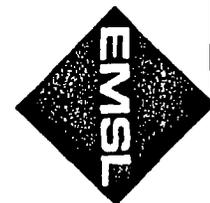
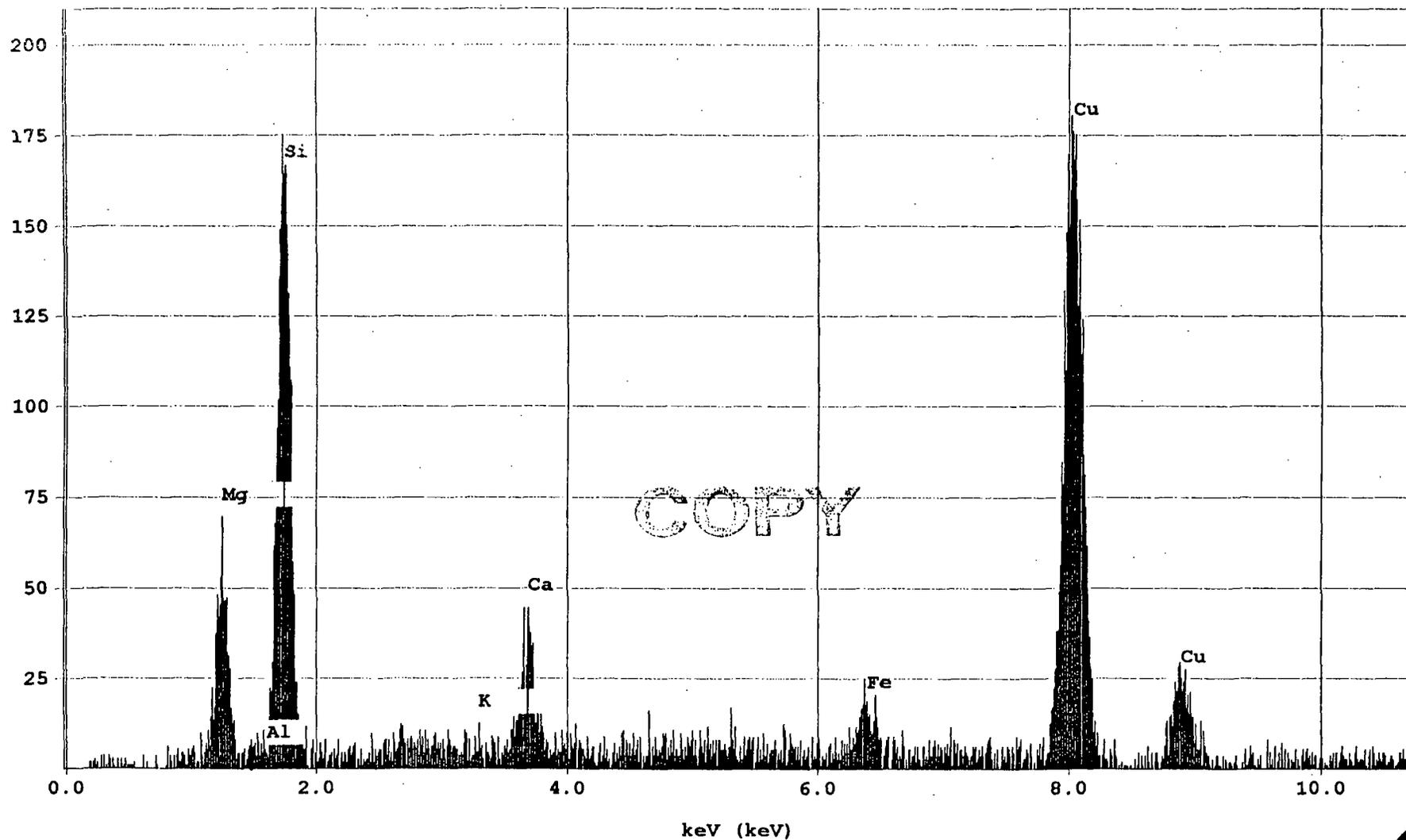


EMSL Analytical, Westmont, NJ

EPA_112849_WR-006-VO: Libby Amphibole

Tuesday, September 18, 2001

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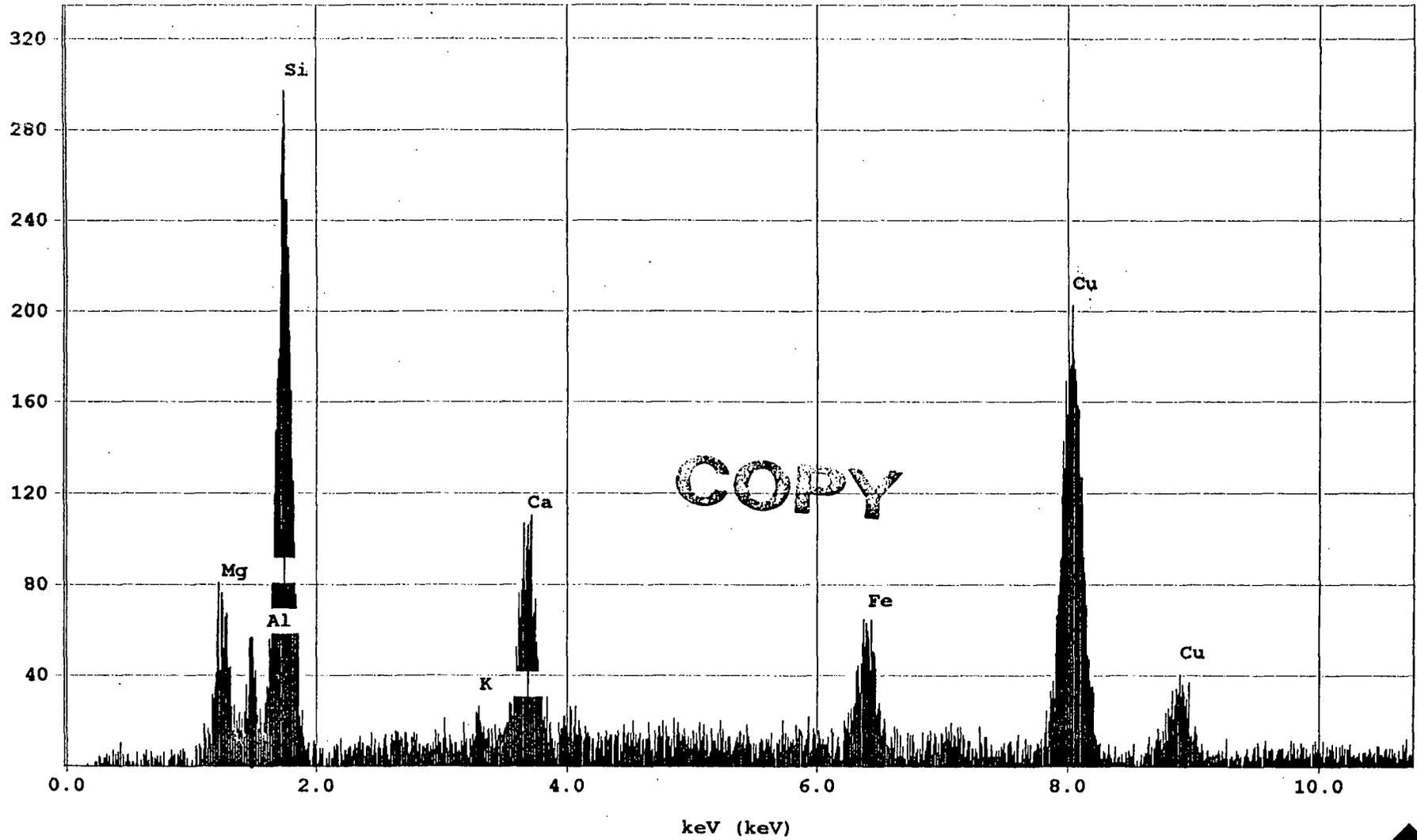


EMSL Analytical, Westmont, NJ

EPA_112849_WR-006-VO: Libby Amphibole

Tuesday, September 18, 2001

17(1):

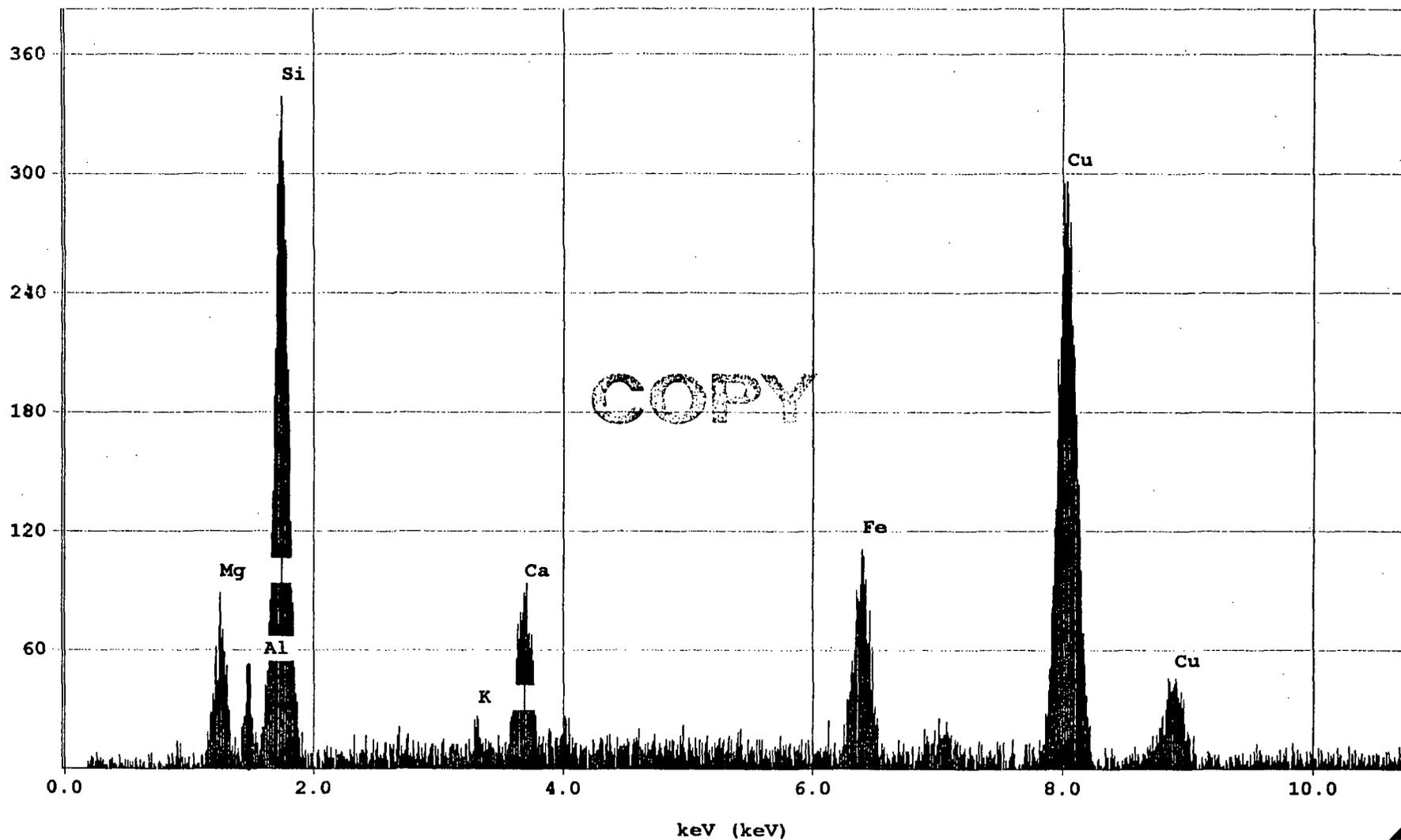


EMSL Analytical, Westmont, NJ

EPA_112849_WR-006-VO: Libby Amphibole

Tuesday, September 18, 2001

17(1):

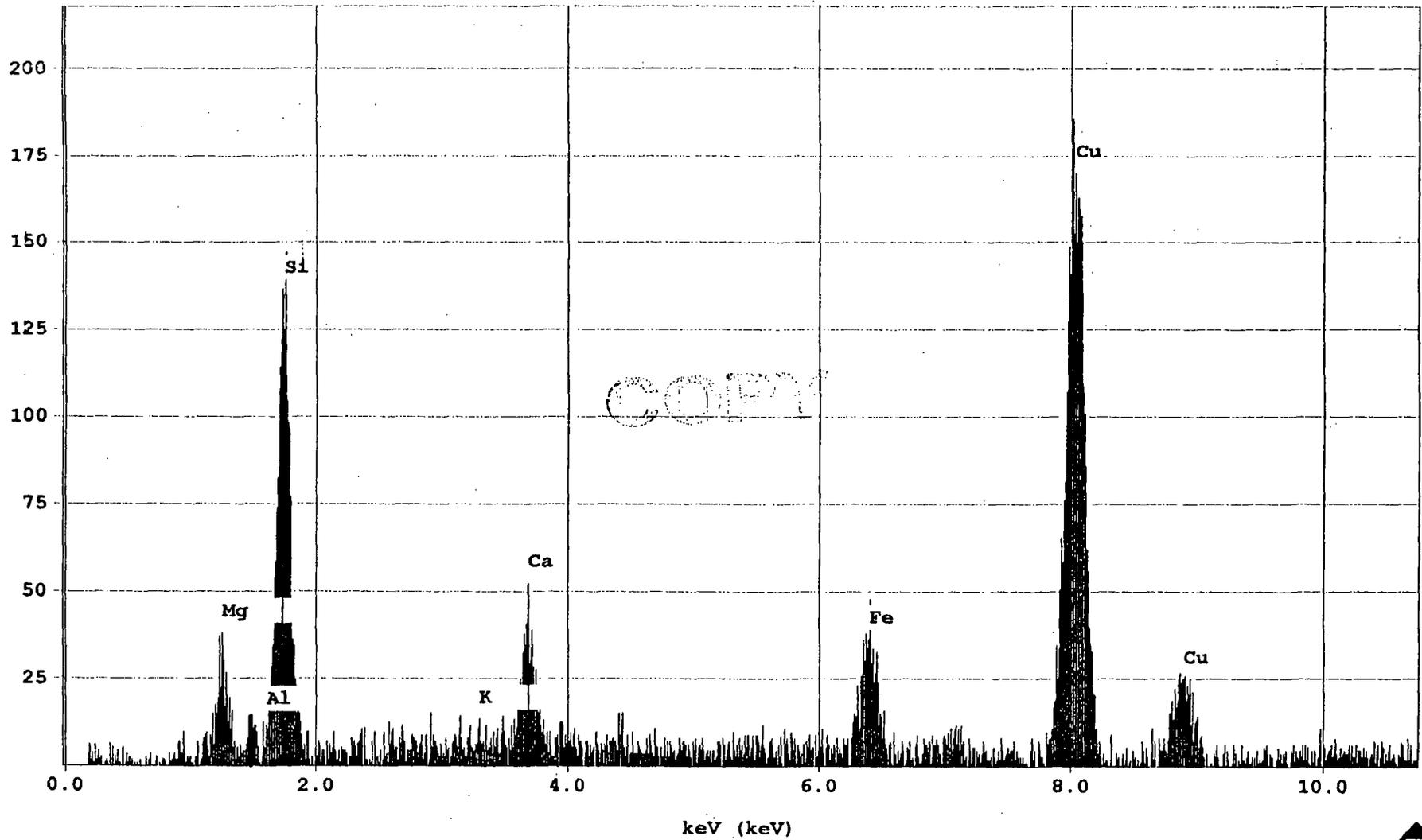


EMSL Analytical, Westmont, NJ

EPA_112849_WR-006-VQ: Libby Amphibole

Tuesday, September 18, 2001

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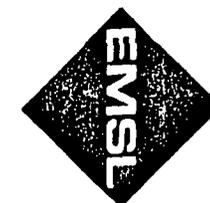
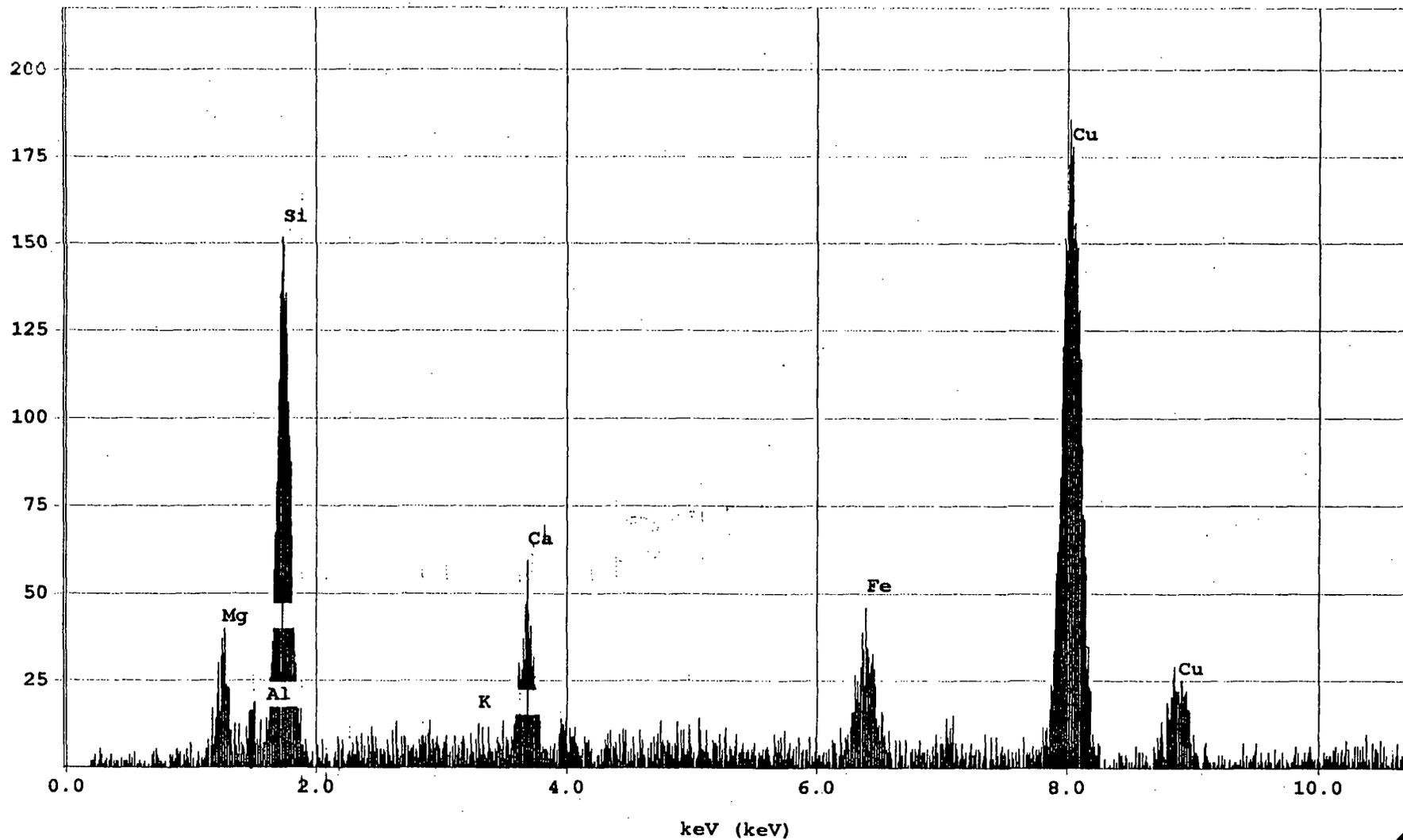


EMSL Analytical, Westmont, NJ

EPA_112849 WR-006-V0: Libby Amphibole

Tuesday, September 18, 2001

10(1):

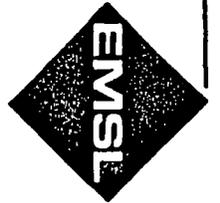
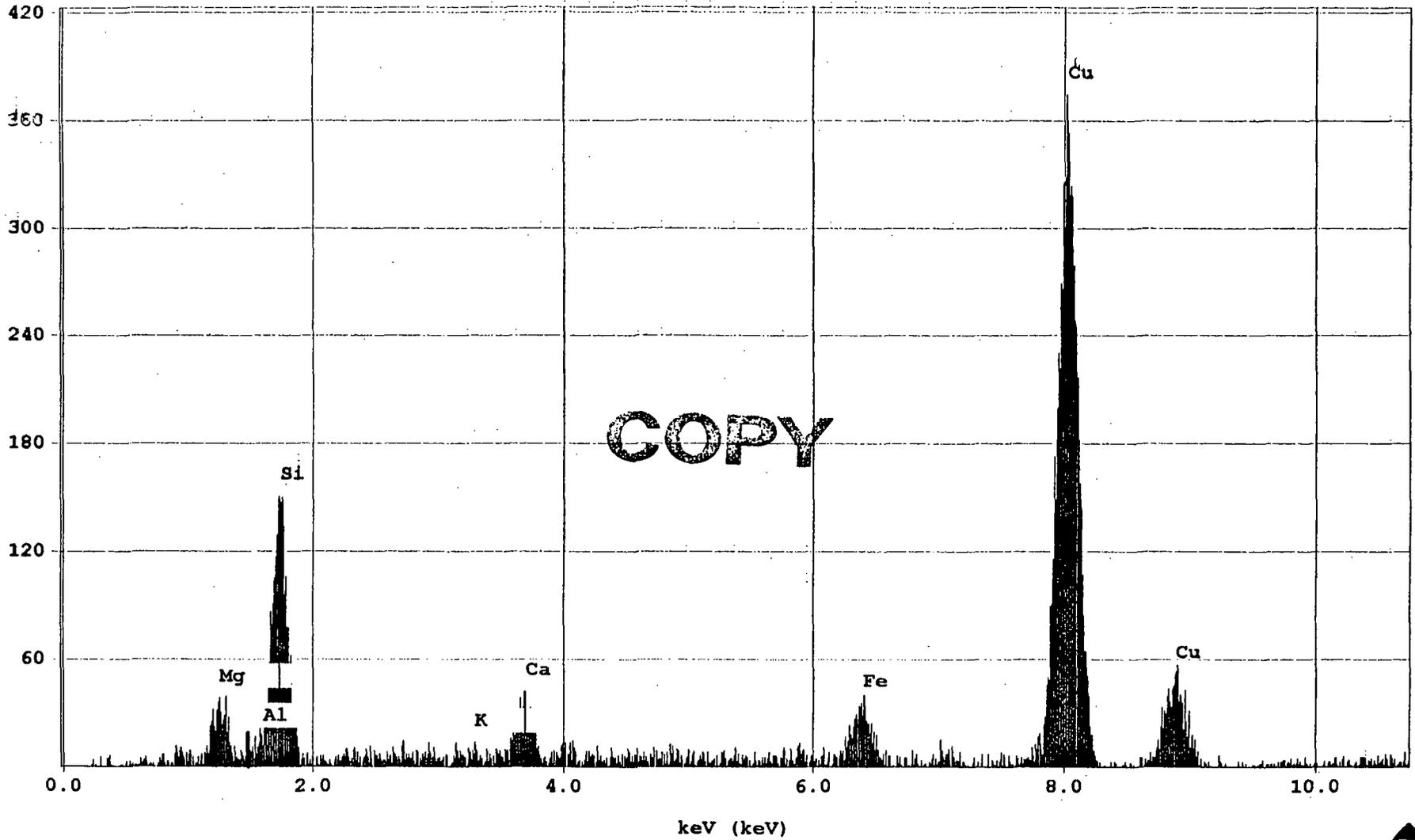


EMSL Analytical, Westmont, NJ

EPA_112849 WR-006-V0: Libby Amphibole

Tuesday, September 18, 2001

H(1):

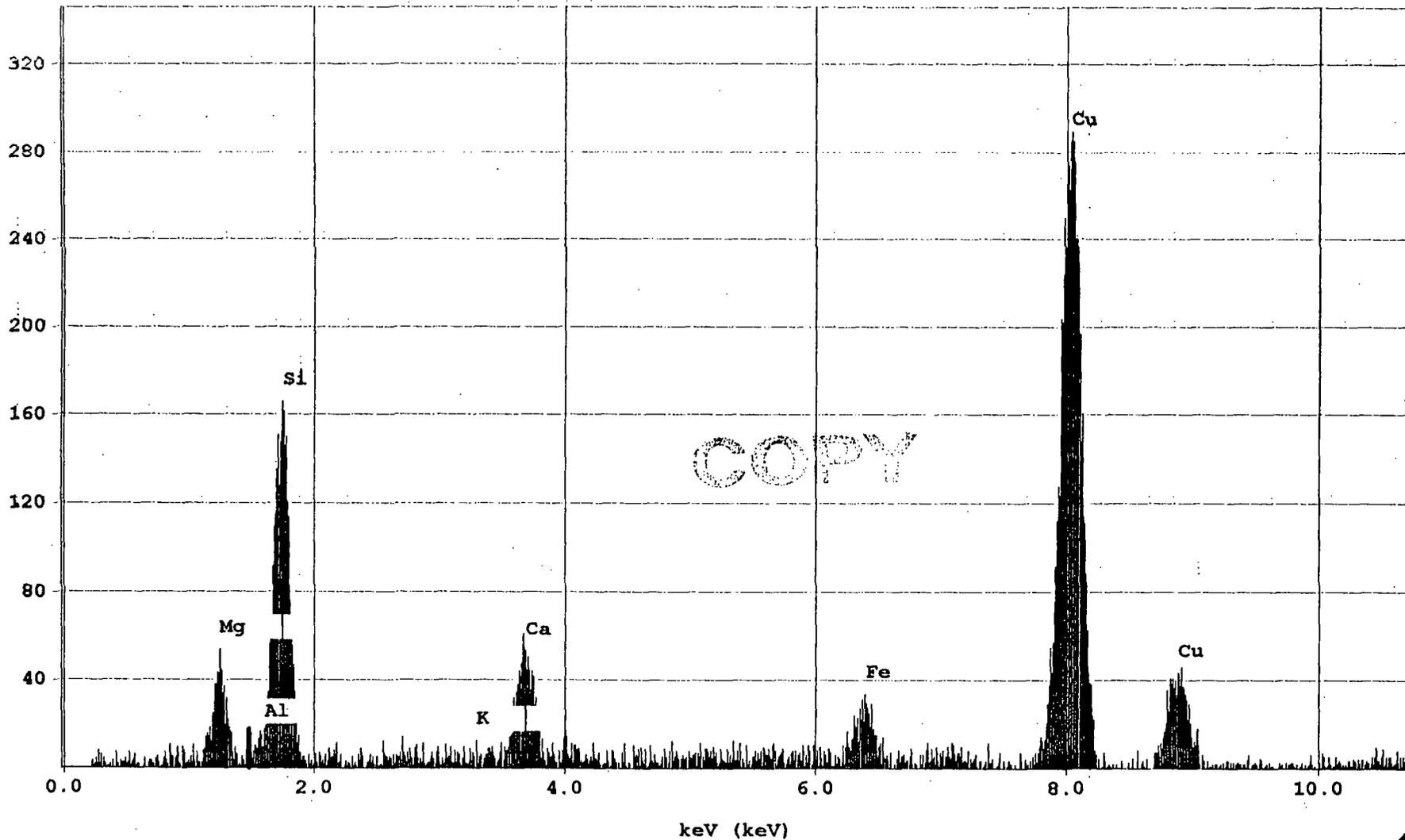


EMSL Analytical, Westmont, NJ

EPA_112849_WR-005-VO: Libby Amphibole

Tuesday, September 18, 2001

11(1):

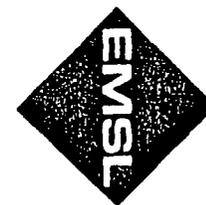
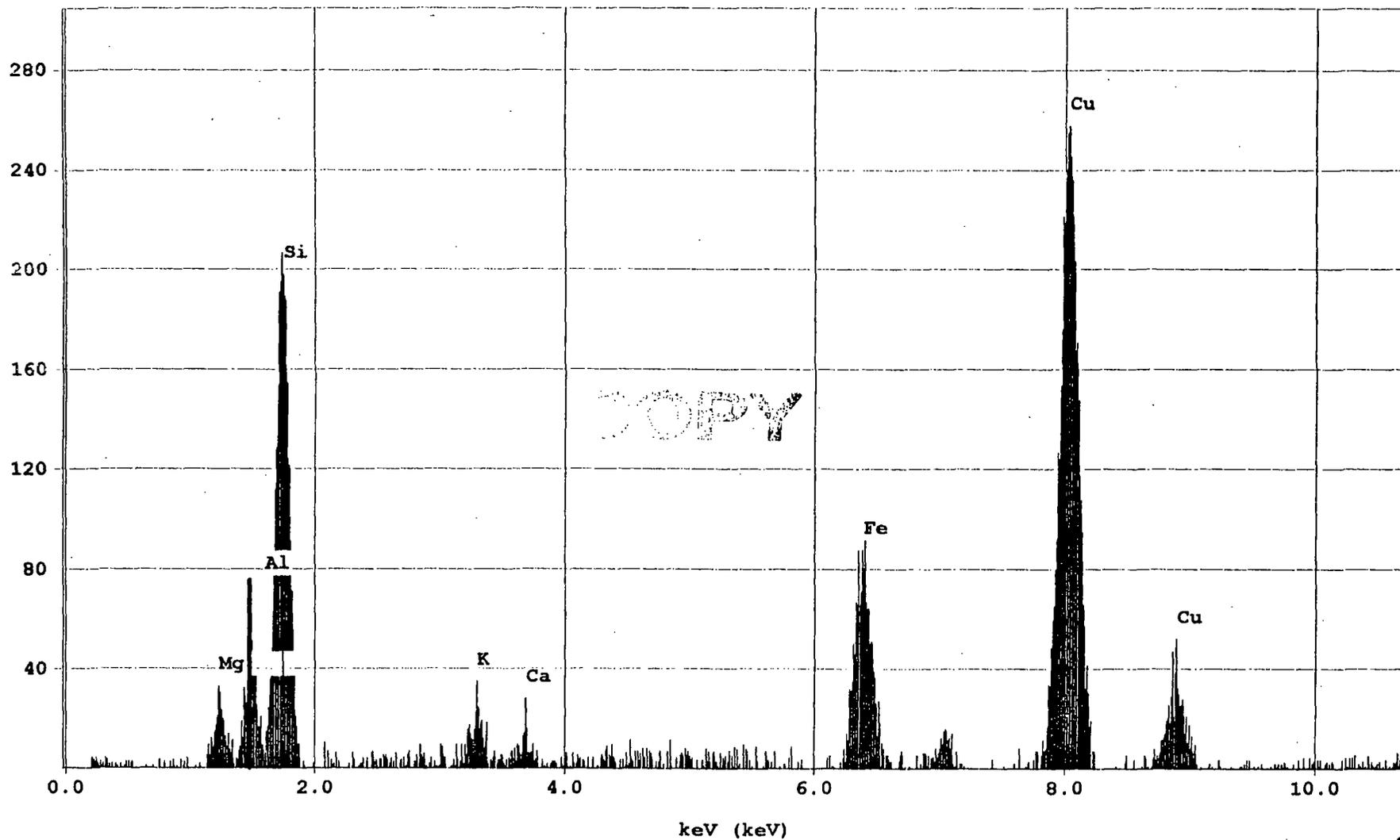


EMSL Analytical, Westmont, NJ

EPA_112849_WR-005-VO: Libby Amphibole

Tuesday, September 18, 2001

11(1):



ELUTRIATOR

USEPA REGION 8 LIBBY SITE INVESTIGATION TEM Asbestos Structure Count

| | |
|--|--------------------|
| Laboratory name: | EMSL, Westmont, NJ |
| Instrument | JEOL 100 CX II (2) |
| Voltage | 100 KV |
| Magnification | 19000 X |
| Grid opening area (mm ²) | 0.0061 |
| Scale: 1L = | 1 |
| Scale: 1D = | 1 |
| Primary filter area (mm ²) | 385 |
| Secondary Filter Area (mm ²) | |

| | |
|--|------------------|
| EPA Sample Number: | WR-007-SS 2 Min. |
| Sample Type (A=Air, D=Dust, O=Other): | D |
| Air volume (L) or dust area (cm ²) | |
| Date received by lab | |
| Lab Job Number: | 040112849 |
| Lab Sample Number: | 0007 |
| Number of grids prepared | 4 |
| Prepared by | BF |
| Preparation date | 9-24-2001 |

| | |
|---|-----------|
| Analyzed by | ADS |
| Analysis date | 9-25-2001 |
| Method (D=Direct, I=Indirect) | D |
| Counting rules (I=ISO10312, A=AHERA, O=Other) | I |
| Grid storage location | 2001-C |

Secondary Prep

| | |
|---|--|
| Fraction of primary filter used: | |
| Total resuspension volume (mL) | |
| Volume filtered for secondary prep (mL) | |

Row T

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class (see below) | | | | Sketch/Comments | 1 = yes, blank = no | | | |
|------|--------------|----------------|-------------------|-------|------------|------------|----------------|---------------------------|----|---|----|-----------------|---------------------|-------|-----|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | |
| 1 | H-7 | MD11 MF | | | 16 13 | 13 1.2 | | LA | | | | | | | | 1 |
| | E-8 | MD11 MF | | | 17 9 | 11 1.5 | | LA | | | | | | | | 1 |
| | I-11 | MD10 MF | | | 3.3 3 | 0.7 0.7 | | LA | | | | | | | | 1 |
| | L-10 | MD10 MF | | | 2.5 2.5 | 1 0.6 | | LA | | | | | | | | 1 |
| | K-5 | MD11 MF | | | 20 16 | 13 0.9 | | LA | | | | | | | | 1 |
| 2 | I-10 | ND | | | 6 | 0.9 | | | | | NA | Si, Ca, Ti, Fe | | | | |
| | F-8 | MD11 MF | | | 12 5.5 | 6 1.4 | | LA | | | | | | | | 1 |
| | J-6 | ND | | | | | | | | | | | | | | |
| | G-6 | | | | | | | | | | | | | | | |
| | D-11 | | | | | | | | | | | | | | | |

COPY

Row T

LA = Libby-type amphibole

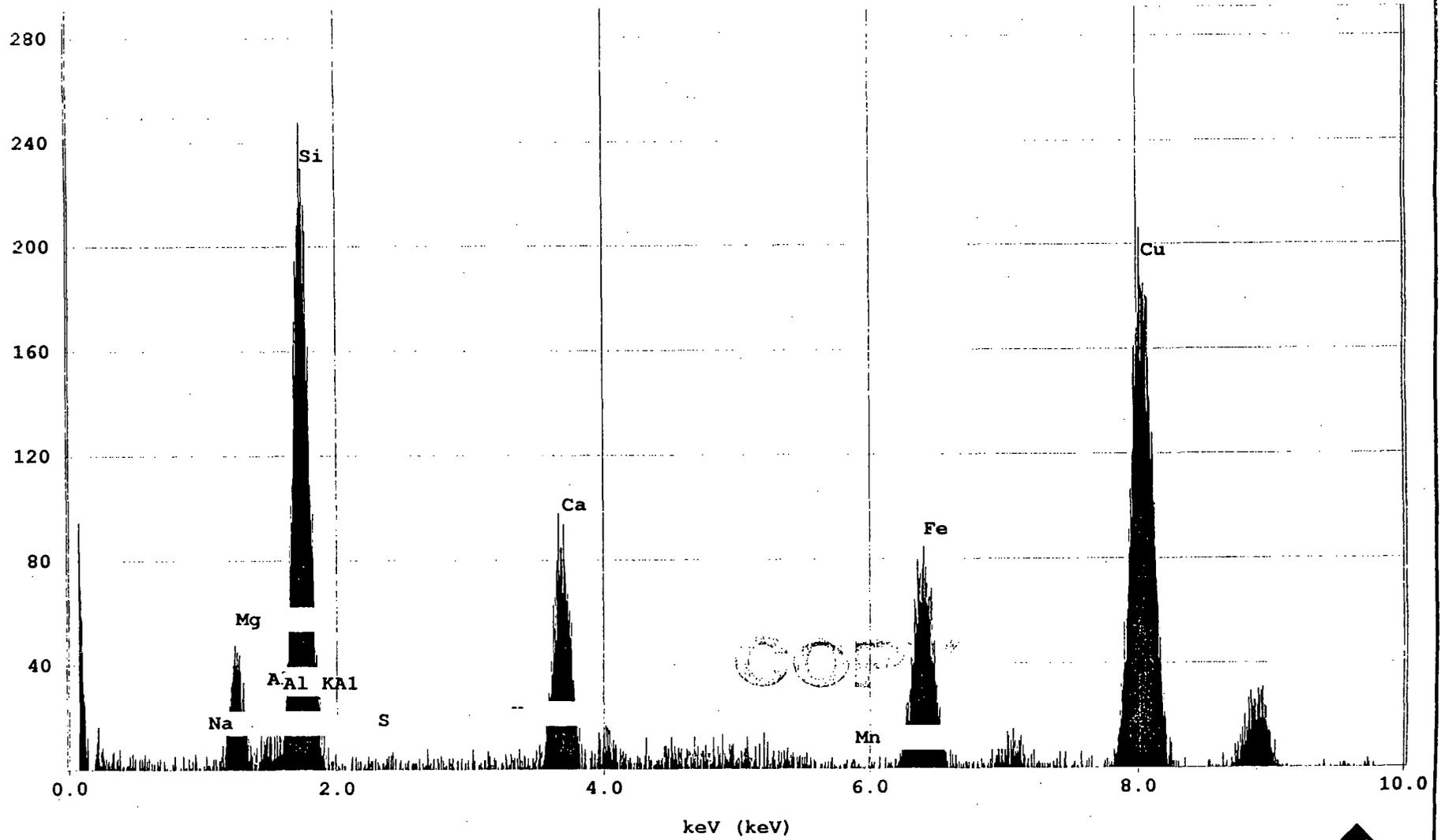
OA = Other (non-Libby type) amphibole

C = Chrysotile

NA = Non-asbestos

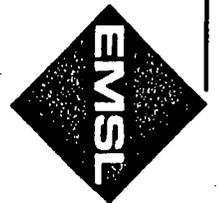
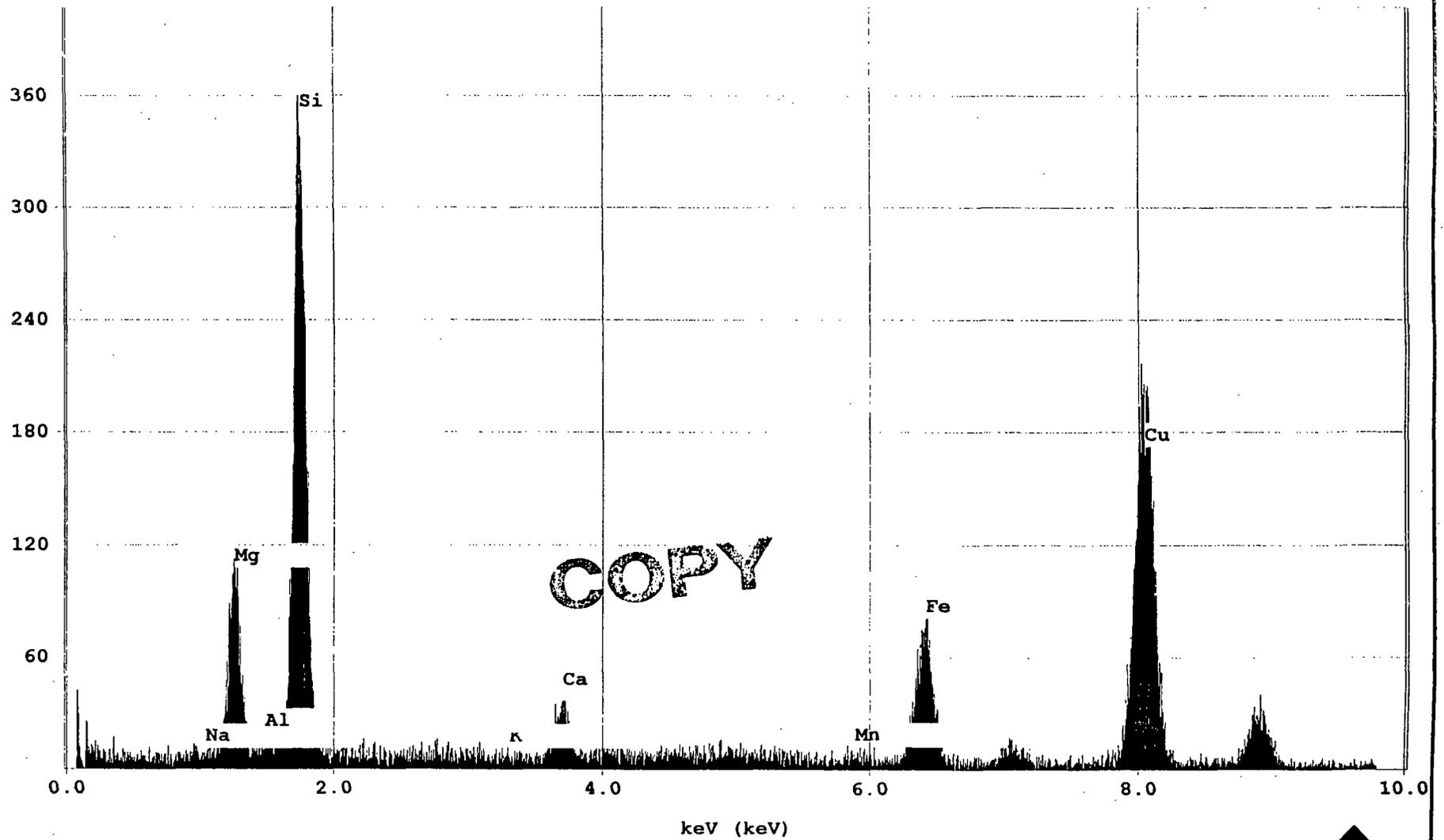
EMSL Analytical, Westmont, NJ
EPA Elutriator_112849 Sample WR-007-SS: Libby Amphibole
Tuesday, September 25, 2001

ED(1):



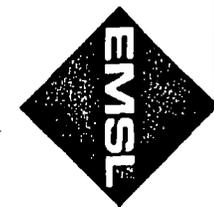
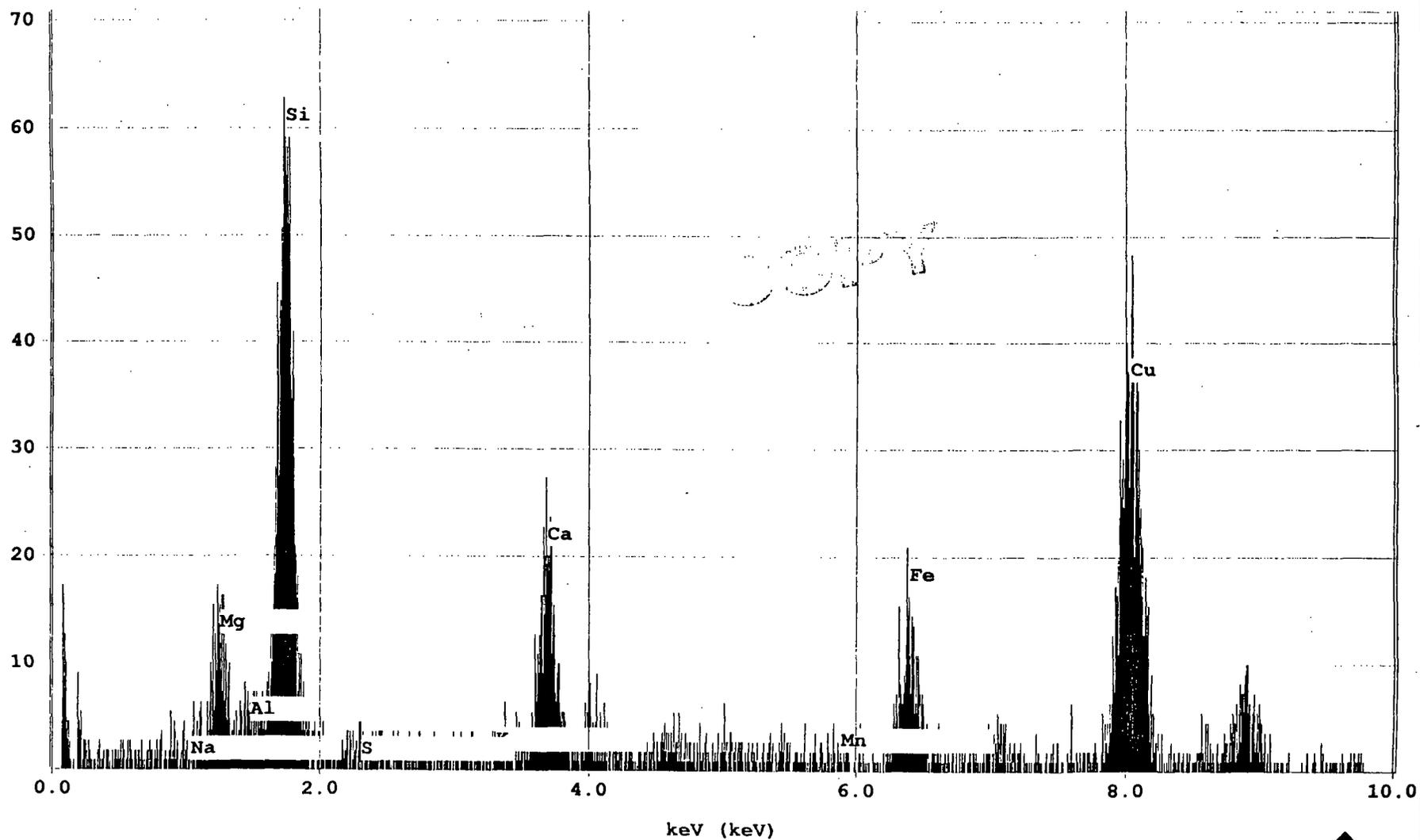
EMSL Analytical, Westmont, NJ
EPA Elutriator_112849 Sample WR-007-SS: Libby Amphibole
Tuesday, September 25, 2001

ID(1):



EMSL Analytical, Westmont, NJ
EPA Elutriator_112849 Sample WR-007-SS: Libby Amphibole
Tuesday, September 25, 2001

ID (1):



ELUTRIATOR

USEPA REGION 8 LIBBY SITE INVESTIGATION TEM Asbestos Structure Count

| | |
|--|--------------------|
| Laboratory name: | EMSL, Westmont, NJ |
| Instrument | JEOL 100 CX II (2) |
| Voltage | 100 KV |
| Magnification | 19000 X |
| Grid opening area (mm ²) | 0.0061 |
| Scale: 1L = | 1 |
| Scale: 1D = | 1 |
| Primary filter area (mm ²) | 385 |
| Secondary Filter Area (mm ²) | |

| | |
|--|-----------------|
| EPA Sample Number: | WR-007-SS 3 Min |
| Sample Type (A=Air, D=Dust, O=Other): | A |
| Air volume (L) or dust area (cm ²) | D |
| Date received by lab | |
| Lab Job Number: | 040112849 |
| Lab Sample Number: | 000 |
| Number of grids prepared | 4 |
| Prepared by | DF |
| Preparation date | 9-24-2001 |

| | |
|--|-----------|
| Analyzed by | JM |
| Analysis date | 9-26-2001 |
| Method (D=Direct, I=Indirect) | D |
| Counting rules (I=ISO10312, A=ASHERA, O=Other) | I |
| Grid storage location | 2001-C |

Secondary Prep

| | |
|---|--|
| Fraction of primary filter used: | |
| Total resuspension volume (mL) | |
| Volume filtered for secondary prep (mL) | |

Row U

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class (see below) | | | | Sketch/Comments | 1 = yes, blank = no | | | |
|------|--------------|----------------|-------------------|-------|------------|-------|----------------|---------------------------|----|---|----|-----------------|---------------------|-------|-----|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | |
| 1 | H-7 | MDII MF | | | 11 | 3 | | LA | | | | | | | | 1 |
| | | F | | | 8 | 1.4 | | LA | | | | | | | | 1 |
| | MDII MF | | | 10 | 2.9 | | LA | | | | | | | | | 1 |
| | I-5 | ND | | | | | | | | | | | | | | |
| 2 | L-7 | F | | | 8 | 0.7 | | LA | | | | | | | | 1 |
| | | MDII MF | | | 11 | 5 | | LA | | | | | | | | |
| | D-10 | ND | | | | | | | | | | | | | | |
| 2 | N-9 | F | | | 3.5 | 0.15 | | LA | | | | | | | | 1 |
| | G-3 | ND | | | | | | | | | | | | | | |
| | C-6 | ND | | | | | | | | | | | | | | |

COPY

LA = Libby-type amphibole

OA = Other (non-Libby type) amphibole

C = Chrysotile

NA = Non-asbestos

Row U

USEPA REGION 8 LIBBY SITE INVESTIGATION
TEM Asbestos Structure Count

LAB NAME: EMSL, Westmont, NJ
LAB SAMPLE NO: 0007

EPA SAMPLE NO: WR-007-55 2 Mu n
SAMPLE TYPE: D

LAB JOB NUMBER: 040112849
GRID STORAGE LOC: 2001-C

Row U

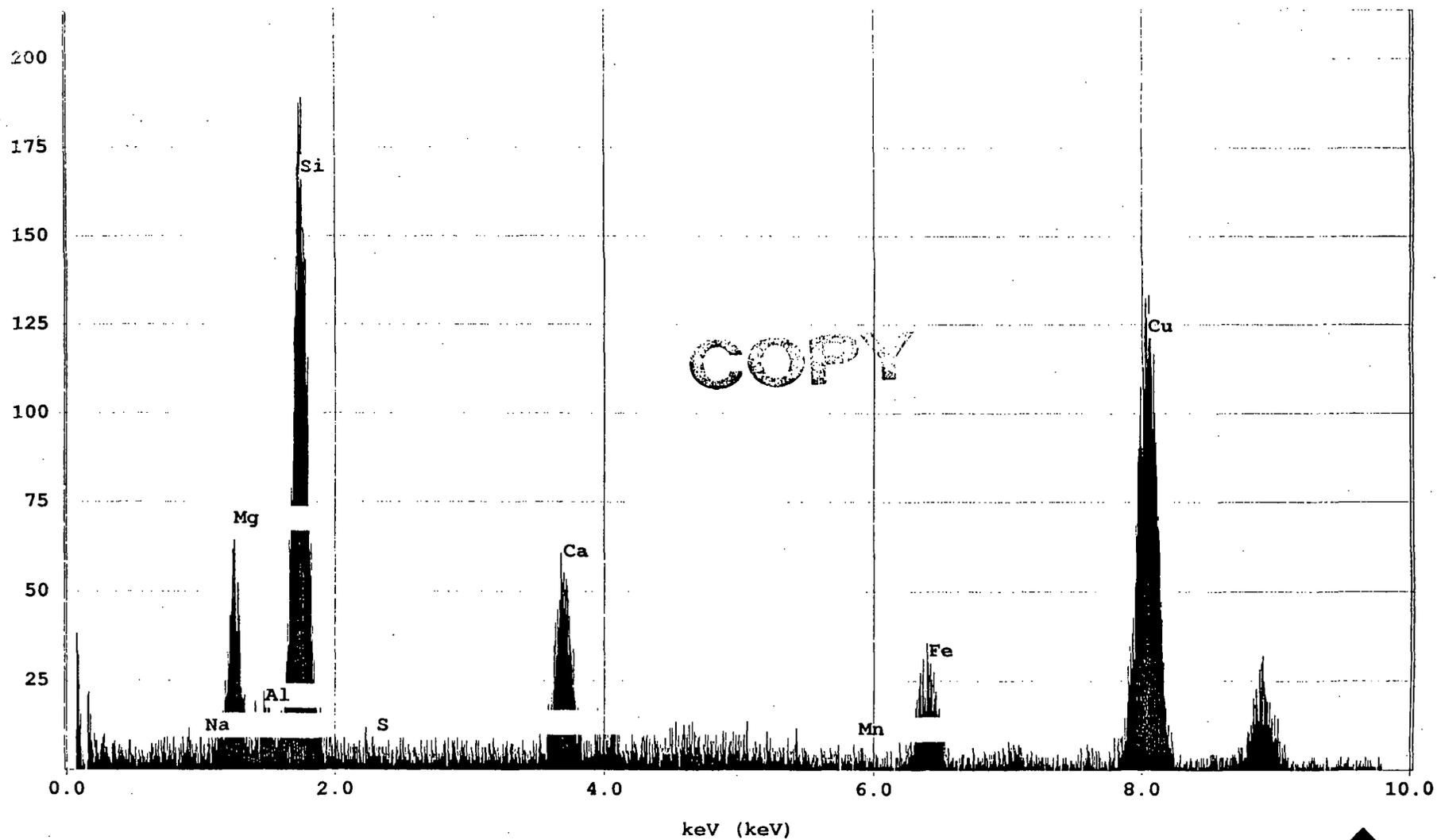
Row U

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class | | | | Sketch/Comments | 1 = yes, blank = no | | | |
|------|--------------|----------------|-------------------|-------|------------|-----------|----------------|---------------|----|---|----|-----------------|---------------------|-------|-----|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | |
| 2 | J-8 | MD11 MF | | | 11 10 | 6 0.6 | | LA | | | | | | | | 1 |
| | | F | | | 4.6 | 0.5 | | LA | | | | | | | | 1 |
| | | MD11 MF | | | 6.2 6 | 4 0.5 | | LA | | | | | | | | 1 |
| | K-13 | | | | | | | | | | | | | | | |
| | H-13 | MD11 MF | | | 11.5 11 | 5 0.15 | | LA | | | | | | | | 1 |
| | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | |
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COPY

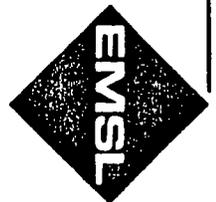
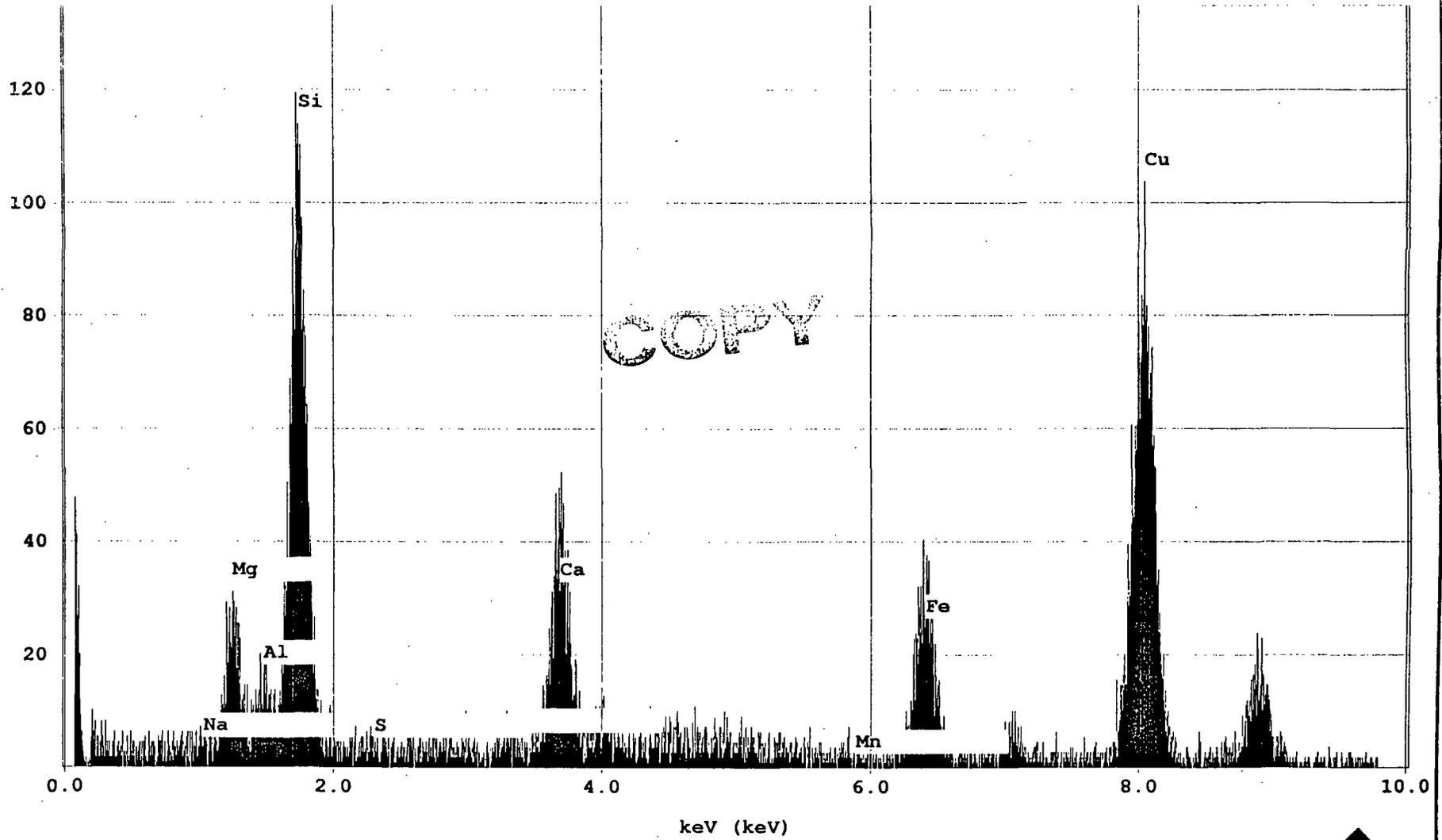
EMSL Analytical, Westmont, NJ
EPA Elutriator_112849 Sample WR-007-SS: Libby Amphibole
Tuesday, September 25, 2001

ID(1):



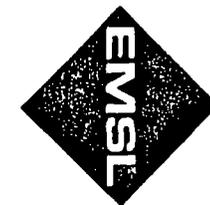
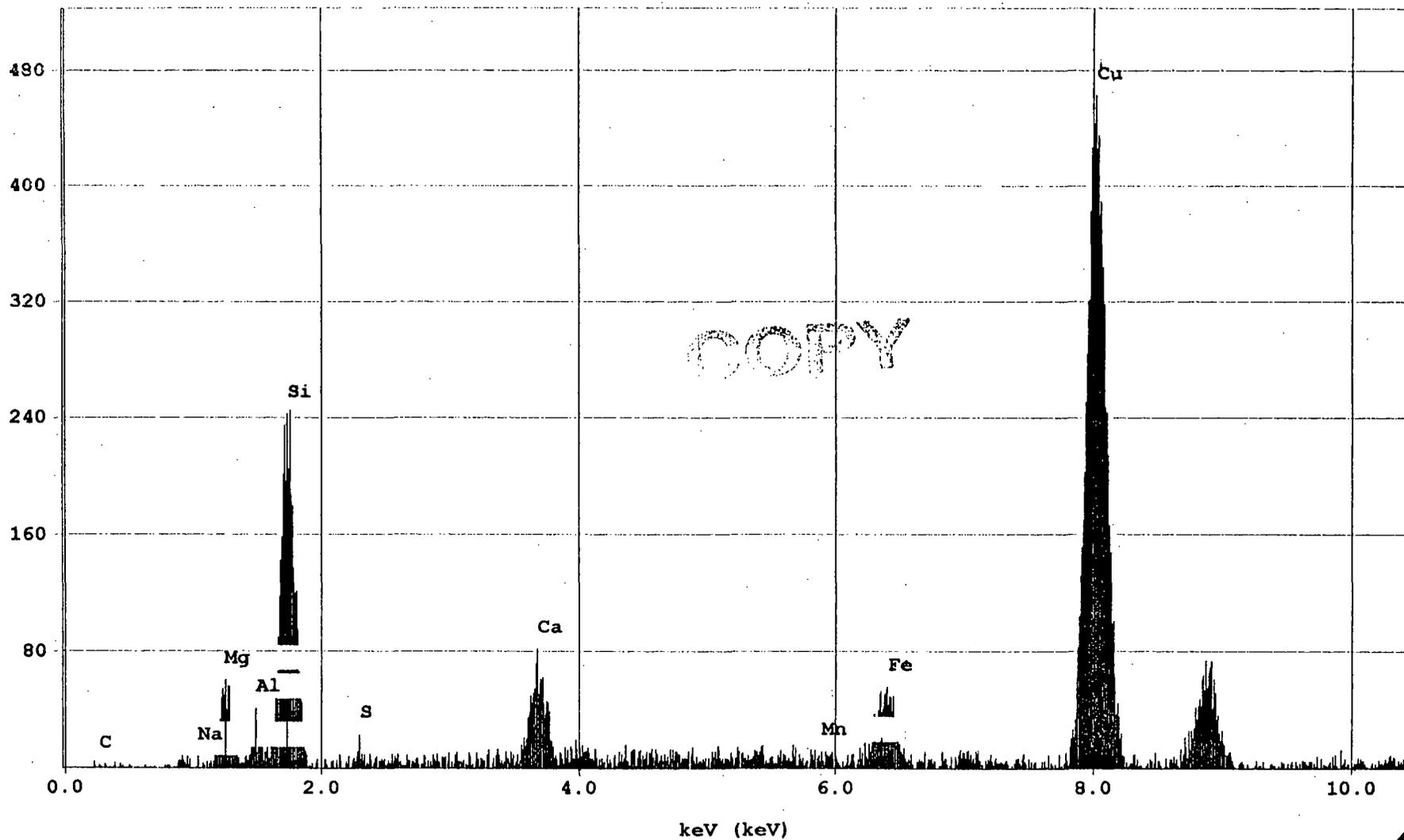
EMSL Analytical, Westmont, NJ
EPA Elutriator_112849 Sample WR-007-SS: Libby Amphibole
Tuesday, September 25, 2001

ID(1):



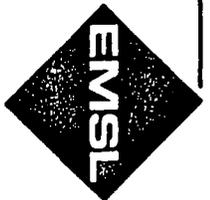
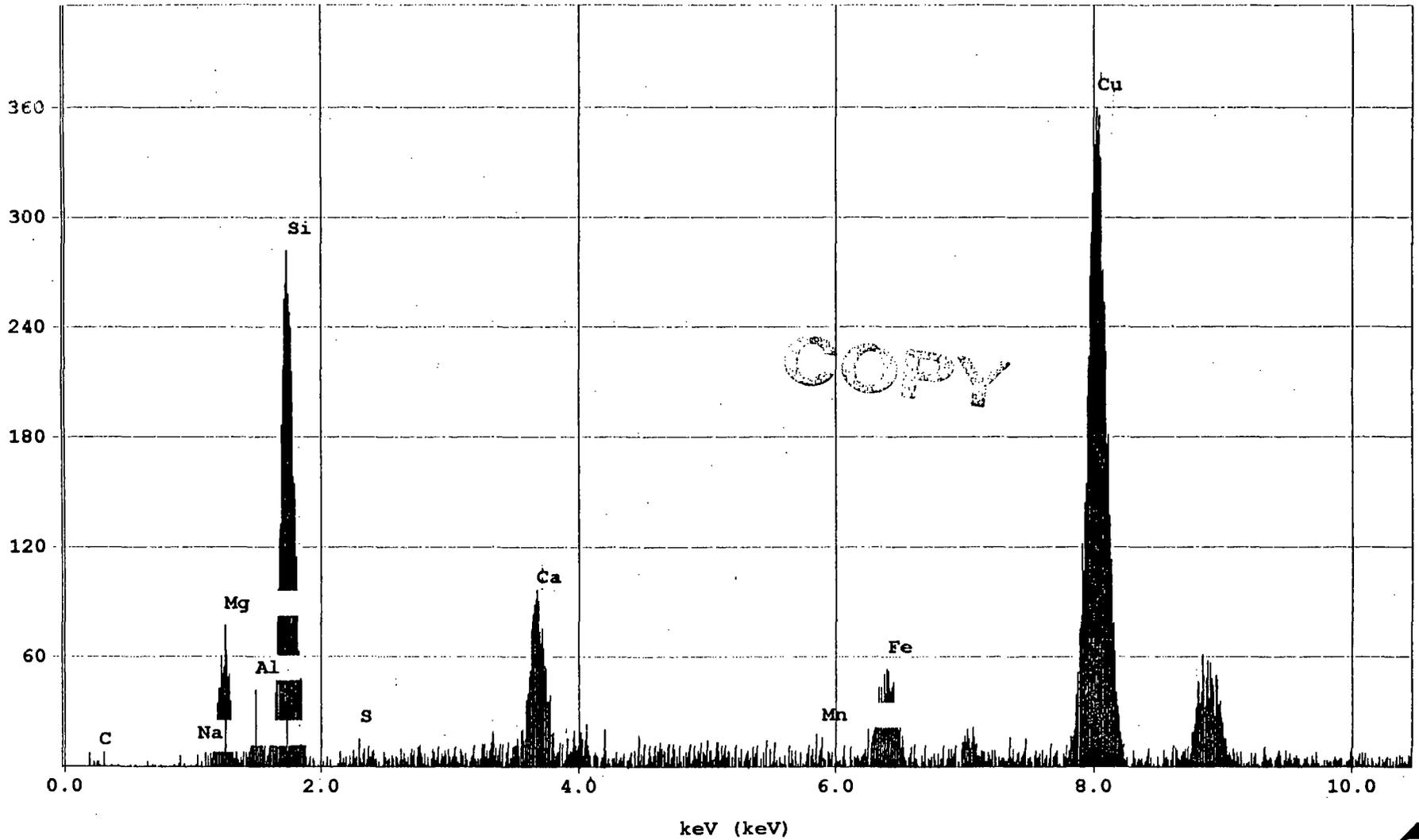
EMSL Analytical, Westmont, NJ
EPA_112849 Elutriator Sample WR-007-SS: Libby Amphibole
Wednesday, September 26, 2001

ID(1):



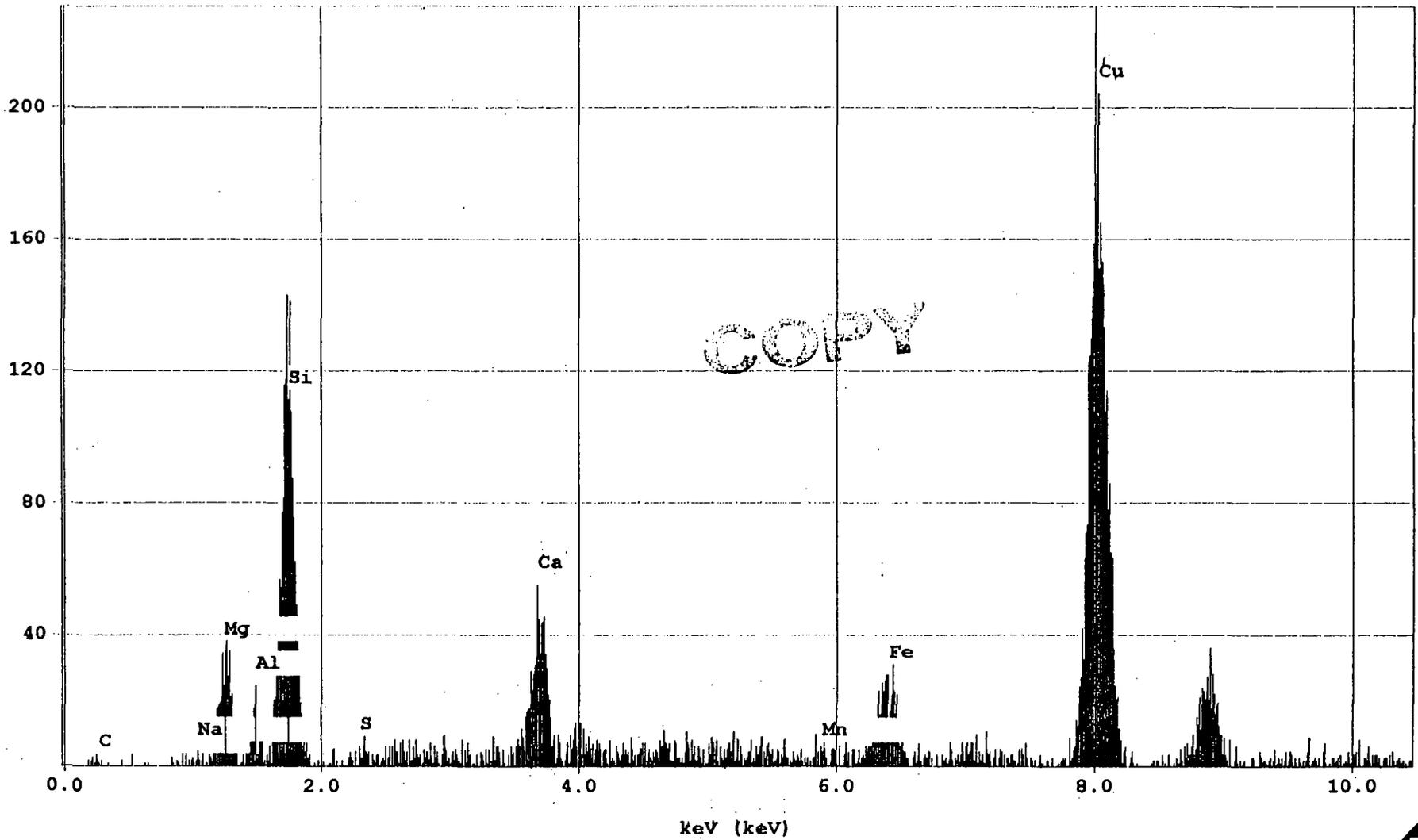
EMSL Analytical, Westmont, NJ
EPA_112849 Elutriator Sample WR-007-SS: Libby Amphibole
Wednesday, September 26, 2001

ED(I):



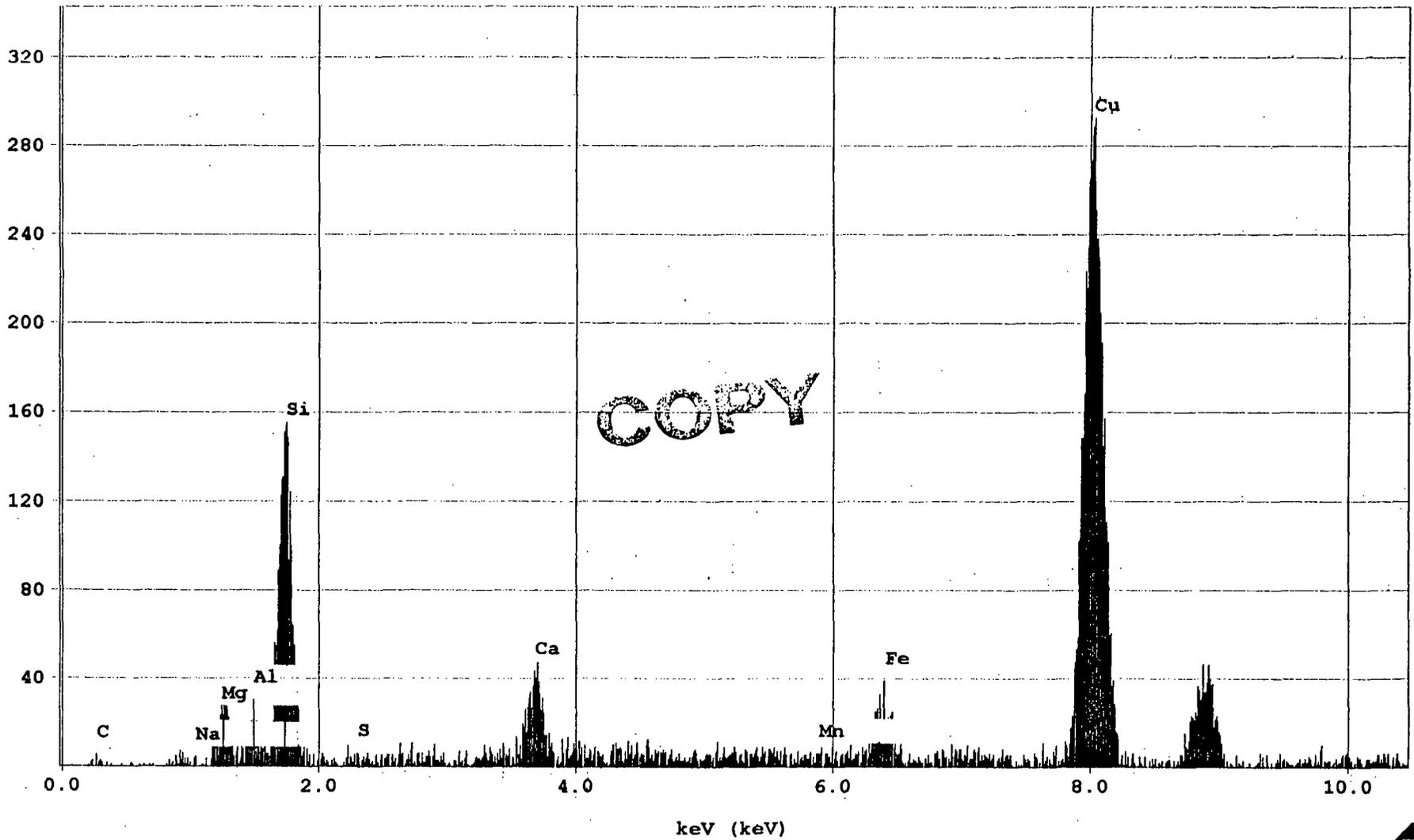
EMSL Analytical, Westmont, NJ
EPA_112849 Elutriator Sample WR-007-SS: Libby Amphibole
Wednesday, September 26, 2001

ES(1):



EMSL Analytical, Westmont, NJ
EPA_112849 Elutriator Sample WR-007-SS: Libby Amphibole
Wednesday, September 26, 2001

EDS (1):



Attn: Jim Gray
 U.S. EPA
 Environmental Services Division
 College Station Rd
 Athens, GA 30613-7799

ELUTRIATOR

USEPA REGION 8 SITE INVESTIGATION
 TEM Asbestos Structure Count

Fax: 7063558744 Phone: 706-355-8613

| | |
|--|--------------------|
| Laboratory name: | EMSL, Westmont, NJ |
| Instrument | JEOL 100 CX II (2) |
| Voltage | 100 KV |
| Magnification | 19000 X |
| Grid opening area (mm ²) | 0.0061 |
| Scale: 1L = | 1 |
| Scale: 1D = | 1 |
| Primary filter area (mm ²) | 385 |
| Secondary Filter Area (mm ²) | |

| | |
|--|-----------|
| EPA Sample Number: | WR-004-VO |
| Sample Type (A=Air, D=Dust, O=Other): | D |
| Air volume (L) or dust area (cm ²) | |
| Date received by lab | 8-7-2001 |
| Lab Job Number: | 040112849 |
| Lab Sample Number: | 0004 |
| Number of grids prepared | 4 |
| Prepared by | DS |
| Preparation date | 9-10-2001 |

60 min

| | |
|---|-----------|
| Analyzed by | JVB |
| Analysis date | 9-18-2001 |
| Method (D=Direct, I=Indirect) | |
| Counting rules (I=ISO10312, A=AHERA, O=Other) | I |
| Grid storage location | 2001 - C |

Row 0

Secondary Prep

| | |
|---|--|
| Fraction of primary filter used: | |
| Total resuspension volume (mL) | |
| Volume filtered for secondary prep (mL) | |

Row 0

| Grid | Grid Opening | Structure Type | No. of Structures | | Dimensions | | Identification | Mineral Class (see below) | | | | Sketch/Comments | 1 = yes, blank = no | | | |
|------|--------------|----------------|-------------------|-------|------------|-------|----------------|---------------------------|----|---|----|-----------------|---------------------|-------|-----|---|
| | | | Primary | Total | Length | Width | | LA | OA | C | NA | | Sketch | Photo | EDS | |
| 1 | H-6 | ND | | | | | | | | | | | | | | |
| | K-8 | | | | | | | | | | | | | | | |
| | I-11 | | | | | | | | | | | | | | | |
| | L-12 | | | | | | | | | | | | | | | |
| | D-5 | | | | | | | | | | | | | | | |
| 2 | G-11 | | | | | | | | | | | | | | | |
| | C-12 | F | 1 | 1 | 4.5 | 0.5 | | LA | | | | | | | | 1 |
| | A-3 | ND | | | | | | | | | | | | | | |
| | I-1 | F | 2 | 2 | 9.0 | 0.55 | | LA | | | | | | | | 1 |
| | K-7 | ND | | | | | | | | | | | | | | |

COPY

LA = Libby-type amphibole

OA = Other (non-Libby type) amphibole